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## OUR PRIVACY AND COOKIE POLICY

### Welcome to our privacy and cookie policy

We want you to be confident we will protect your personal information and respect your privacy. Our privacy policy explains what personal information we collect about you, why we collect it and what we do with it.

Please read it carefully. It applies to people who benefit from the Fund, donate to the Fund, who may be entitled to benefit from the Fund, or who may wish to donate to it.

The privacy policy applies even if you do not benefit from or donate to the Fund but you interact with us, e.g. by ordering Christmas cards from us, entering a prize promotion, calling our office, generally enquiring about our service or otherwise providing your personal information to us.

If you need to give us personal information about another person in relation to our service, the privacy policy will also apply to that personal information. Where we need the consent of the other person to use their personal information we will let you know and ask you to get that consent on our behalf.

We regularly review our privacy policy. It was last updated on 1<sup>st</sup> August 2022. We will notify you if we change the policies, as set out [here](#).

### What's not included?

This privacy policy doesn't apply to the information we hold about companies or other organisations. The privacy policy is intended to tell you how we use personal information but is not intended to create a contract with you.

You can link to third party websites from our website. This privacy policy does not apply the use of your personal information by those third parties.

Our privacy policy does not cover the collection and use of your personal information practices by other companies and organisations that promote our service and that use [cookies](#), [tags](#) and other technologies to serve and offer relevant online advertisements to you. For information about how we use cookies on our website, please see our [cookie policy](#) at [www.benevolent.bt.com/privacy-and-cookie-policy/cookies](http://www.benevolent.bt.com/privacy-and-cookie-policy/cookies)

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You should review the privacy policies of those third parties before providing your personal information to them.

### Who are we?

In this policy, "we", "our" and "the Fund" means the [BT Benevolent Fund](#).

We provide financial help to individual people who need it, for a number of reasons. People who are entitled to claim are people who work for BT, or have previously worked for BT (and, in some instances, their dependents). Currently, the Fund provides over 200 elderly former BT people, on very low incomes, with living grants to improve their quality of life. The Fund also makes one off payments to individuals to help them in relation to a particular need, for example, debts, or the need for essential household items.

The Fund is a charity and is a separate legal entity to BT plc.

## WHAT WE COLLECT AND WHAT IT IS USED FOR

### What kinds of personal information do we collect and how do we use it?

The [personal information](#) we collect about you will depend on why we interact with you. We have set out below the different purposes for which we use your personal information.

#### To see if we can help you

Occasionally we will write to you, as a BT Pensioner aged over 75, to see if you need our support. We use your name and address, as provided to us by BT Pensions.

We do this because it is in our legitimate interests as a charity to see if we can help those we are here to support. We only proactively contact those BT Pensioners over 75 years as our experience shows that this is the group that are most likely to need our help.

You can ask us to stop writing to you at any time, as set out below.

#### To see if you can help us

Occasionally we will write to you, as a BT Pensioner aged under 75, to see if you would like to donate to the Fund. We use your name and address, as provided to us by BT Pensions.

We do this because it is in our legitimate interests as a charity to see if we can appeal to those that could help us in helping those we are here to support and only if you haven't told us not to. We only proactively contact those BT Pensioners under 75 years as our experience shows that this is the group that are most likely to support our charity.

You can ask us to stop writing to you at any time, as set out below.

#### To manage your application and provide you with financial support

We'll use your personal information to assess your application for financial help and deliver support to you. This applies to one-off and regular financial support payments.

This means we'll:

- Record details about your application and the financial support we have provided to you.
- Update you on the status of your application.

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- Send you information messages about how your financial support will be provided, such as organising a delivery, and to confirm you have received the payment.
- Train our people and suppliers to provide you with financial support.
- Give information to a third party where necessary to provide you with the support you need.
- Undertake surveys and research about our service.
- Better support you if you have a disability.

We use the following personal information to manage your application and provide support to you:

- Your contact details and information required to validate your identity. This means your name, gender, address, telephone number, date of birth, email address, credentials required to validate your identity and your communications with us.
- Details of applications you make and the support provided to you.
- Your payment and financial information including your bank and savings account details, to make a payment to you, be it regular or one-off, and to check you are entitled to claim.
- Your communications with us. We will keep records of our communications with you, including e-mails, letters and phone conversations. We also log the information you provide us with such as any settings or communication preferences you ask us to support.

We use this personal information because it is necessary for us to provide you with support and because it is in our legitimate interests as a charity to make sure all applicants are entitled to claim. Where we need your personal information in order to fulfil our agreement to provide you with support, if you do not provide it, provide it inaccurately or require us to delete it, then we may not be able to provide you with the support you need.

We have to keep and may have to disclose personal information about you to our auditors as part of being a registered charity in the UK. We disclose personal information only where we have a legal obligation to do so and will minimise this wherever possible.

Where we record that you have a disability we will only do so where you have told us and only where you have given us your consent. For example if you have told us you have a disability which we need to be aware of when delivering something to you, we note it on the record we hold about you but only when you have said it is ok for us to do so.

### **To manage your donation and keep you up to date with our activities**

We'll use your personal information for the purposes of managing any donations made to us and keeping you, as a member, up to date with our activities. This applies to one-off and regular donations. We'll also use your personal information if we believe you may be interested in donating to us. We do so either where you have donated to us in the past, you are a BT employee (past or present) or because you have contacted us by some other means (for example, you called to enquire about our service and told us you didn't mind being contacted).

This means we'll:

- Record details about the donation you have made to us.
- Send you information about how we have used your donation in our annual newsletter.
- Train our people and suppliers to manage your donation to us.
- Undertake surveys and research about how we operate.
- Use your information in making Gift Aid claims to HMRC, if you have supplied us with a Gift Aid declaration.

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We use the following personal information to provide products and services to you:

- Your contact details and information required to validate your identity. This means your name, gender, address, telephone number, date of birth, email address and credentials required to validate your identity and your communications with us, such as your BT pension number.
- Details of the donations you have made to us.
- Your communications with us. We will keep records of our communications with you, including e-mails, letters and phone conversations. We also log the information you provide us with such as any settings or communication preferences you ask us to support.

We use this personal information because it is necessary for us manage your donation to us but also because it is in our interests as a charity to let you know what we have done with your donation and appeal for further support. We do not receive any donor bank account information as all donations are made via BT Payroll Giving, deduction at source from a BT pension, standing order or in cash.

You can ask us to stop sending you our newsletters or emails at any time, as set out below.

### **To create aggregated and anonymised data**

We will use your personal information to create aggregated and anonymised data. You will not be identifiable from that aggregated and anonymised data. We do this because we have a legitimate interest in generating insights that will help with how we operate as a charity and best serve those we are here to help. This includes sharing anonymous case files with our Trustees and statistics on the support we have provided to promote our work.

## SHARING YOUR INFORMATION

### **Do we pass personal information to anyone else?**

Yes, sometimes, but only if we need to for the purposes of managing the Fund. For example, we use an external mailing house to help us to send out our newsletters. We also pass delivery information (individual name and address) to companies if we buy products that need to be delivered direct to the beneficiary. On rare occasions we may share your personal information with other charities that we believe may be able to help you. We only do this if we have your consent to do so.

We will not disclose personal information about your health to anyone else unless we have your express consent.

There are other legal reasons where we may need to pass personal information to a public body. For example, we may be asked to pass information to law enforcement agencies, to investigate any crime.

We share a small number of case files with our Trustees each year. We do this to allow our Trustees to fulfil their roles and check on the workings and status of the Fund. If your case file is included, your name, address, email address and telephone number will be removed.

## PROTECTING YOUR INFORMATION AND HOW LONG WE KEEP IT

### **How do we protect your personal information?**

We have strict security measures to protect your personal information. This includes checking your identity when you contact us, following our security procedures and applying suitable technical measures.

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### How long do we keep your personal information?

We will store personal information for the periods necessary for the purposes for which the data was collected or for which it is to be further processed. We will keep data for a longer period where required to by law.

## ACCESSING AND UPDATING HOW WE USE YOUR INFORMATION

You can access and update the information we hold about you by sending us a request. We will normally respond within one month of your request but may take a further two months if the request is complex or we receive a large number of requests, but we will always let you know.

Please note, whilst we are required to complete your request free of charge, we are allowed to reject requests if they are repetitive or manifestly unfounded or excessive. We will always let you know why.

### Want a copy of the data we hold about you?

You can ask us for a copy of the information we hold about you by emailing us at [benevolent@bt.com](mailto:benevolent@bt.com), or writing to us at:

Room 4210  
Bristol Central Telephone Exchange  
Marsh Street  
Bristol  
BS1 4AY

Please always mark your request as “Data Subject Access Request”, so we can easily identify it and see it gets handled properly.

We will provide the information requested free of charge but may charge a reasonable fee to cover our administrative costs for repeat requests.

We will respond to a request electronically unless you advise us otherwise.

### Concerned about what we are doing with your personal information and how to withdraw your consent?

You can ask us to **correct, complete, delete** or **stop using** any personal information we hold about you by emailing us at [benevolent@bt.com](mailto:benevolent@bt.com), or writing to us at:

Room 4210  
Bristol Central Telephone Exchange  
Marsh Street  
Bristol  
BS1 4AY

If you want us to stop using your personal information collected via cookies on our website, you should change your cookie settings [insert link to cookie policy].

We may in certain instances only be able to partially complete your request or may not be able to complete it at all as we either have to keep information to be able to fulfil our legal and regulatory obligations, to continue providing support to you or managing your donation to us, or because there are other legitimate reasons to keep it. But we will always tell you why.

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We will always respect your request. Because of this, when you delete or change, or ask us to delete or change, your information from our systems and records we may not immediately delete that information from our backup systems or residual copies that remain on our active servers, and we may need to retain some information to ensure we can fulfil your request (for example, retaining your name, email and/or address to make sure we do not include it on our newsletter or ‘can we help?’ letters list after you have asked us to not to send these to you).

We will verify any changes, where we can, such as checking against the Postal Address File, or we may need further information from you to verify it.

Where we have asked for your consent, you can withdraw your consent at any time. It will take us up to 30 days to process your request. It will also only apply to our use of your personal information in the future, not what we have done in the past.

## HOW TO CONTACT US AND FURTHER DETAILS

### Who to contact if you have a question about how we use your information?

If you’d like any more details, or you have comments or questions about our privacy policy, write to us at:

Room 4210  
Bristol Central Telephone Exchange  
Marsh Street  
Bristol  
BS1 4AY

If you want to make a complaint on how we have handled your personal information, please contact us and we will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal information in line with the law, you also have the right to complain to the data protection regulator, that’s the Information Commissioner - <https://ico.org.uk/>.

### How will we notify you of changes to the policy?

Our privacy policy may change from time to time. We will post any changes on this on our website for a minimum of 30 days and, if the changes are significant, we will provide a more prominent notice (if appropriate this will be in the next communication we send you).

## COOKIES

### Visitors to our website

When someone visits [www.benevolent.bt.com](http://www.benevolent.bt.com) we use Google analytics to collect standard log information about them and general details of visitor behaviour patterns. We do this to find out how many people visit the site. We collect this information in a way that does not identify anyone. We do not seek to link that information to anyone or use it in any other way.

### Do we use cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or to provide information to the owners of a website about how it is being used by visitors to that website.

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We use cookies only as part of Google analytics, to see if someone has viewed our website previously.

If you do not want us to do this then [you can visit here to opt out of this service:](https://tools.google.com/dlpage/gaoptout)

<https://tools.google.com/dlpage/gaoptout>