

Version	5
Date Ratified	20 th May 2026
Date for Review	20 th May 2028

Privacy Notice

We appreciate the importance of maintaining the confidentiality of information that you have shared with us. This notice explains what personal information we collect, how we use it, who we share it with, how long we keep it, and your rights in relation to that information. It explains the ways that we protect privacy as required under applicable UK data protection law, including the UK General Data Protection Regulation (the “**UK GDPR**”), the Data Protection Act 2018 and, where relevant, the Privacy and Electronic Communications Regulations.

In this notice, the terms “we,” “our” and “us” refer to Bromley Mencap, its directors, employees and registered representatives, whether such individuals are engaged directly by us as employees or as independent contractors.

We do not rent or sell to anyone the personal information that is entrusted to us.

We only share personal information with others as is allowed by law.

Types of Non-Public Personal Information that We Collect

In the course of our work, we collect and maintain personal information about clients, members, donors, supporters, volunteers, staff and other people we work with. This may include identification and contact details (for example name, address, telephone number, email address and date of birth), membership or service-related information, communication preferences, donation and Gift Aid information, records of correspondence and interactions with us, and other information you provide through forms, applications, referrals, meetings, events, our website or other communications. In some cases, we may also process more sensitive information where this is necessary and permitted by law.

How We Use Personal Information

We only use personal information where we have a lawful basis to do so. Depending on the circumstances, this may include where processing is necessary to provide services or take steps requested by you, to comply with a legal obligation, for our legitimate interests as a charity and service provider where those interests are not overridden by your rights and interests, or because you have given consent. Where we process special category personal data, we will only do so where an additional condition under data protection law also applies.

The table below gives further detail about the main purposes for which we use personal information, the types of information involved, and the lawful basis we usually rely on.

Purpose	Categories of personal information	Lawful basis
Providing services, support, activities and membership functions	Identification and contact details, membership or service-related information, referral details, records of support provided, correspondence, and in some cases special category data where necessary and permitted by law	Contract where applicable; legitimate interests; legal obligation where required; and an additional condition under data protection law where special category data is used
Administering donations, Gift Aid, events and supporter relationships	Identification and contact details, donation history, payment and transaction records, Gift Aid declarations, event participation details, and communication records	Contract where applicable; legal obligation for tax and accounting requirements; and legitimate interests in administering fundraising and supporter engagement
Responding to enquiries, applications, complaints and safeguarding or welfare concerns	Identification and contact details, application information, correspondence, case notes, and where relevant information relating to health, care, safeguarding or other sensitive matters	Legitimate interests; legal obligation where safeguarding, regulatory or complaint-handling duties apply; and an additional condition under data protection law where special category data is used
Keeping records, managing our organisation and improving our services	Identification and contact details, service and membership records, donation records, correspondence, communication preferences, website or event interaction information, and administrative records	Legitimate interests in the effective administration and improvement of our charity and its services; and legal obligation where records must be retained or disclosed by law
Complying with legal, regulatory, safeguarding and funding requirements	Any categories of personal information reasonably required for compliance, reporting, audits, due diligence, safeguarding, fraud prevention or responding to lawful requests	Legal obligation; and legitimate interests where compliance activity is not strictly required by law but is necessary for responsible governance and risk management
Sending marketing and fundraising communications	Name, contact details, communication preferences, supporter history, donation history and records of engagement with our communications and events	Consent where required by law, particularly for certain email and text marketing; otherwise legitimate interests where permitted and where you would

		reasonably expect to hear from us
Prospect research, profiling and due diligence for fundraising	Contact details, supporter history, donation history, publicly available professional or biographical information, and information from publicly available registers, media reports and online sources	Legitimate interests in planning and delivering proportionate fundraising activity, carrying out appropriate due diligence, and protecting the charity from financial and reputational risk

Where required by law, we will ask for your consent before sending you marketing by email or text. In other cases, we may contact you where the law allows us to do so and where you would reasonably expect to hear from us. You can opt out of marketing communications at any time by emailing enquiries@bromleymencap.org or by using the unsubscribe option in the communication. If we rely on consent, you may withdraw that consent at any time.

Who We Share Personal Information With

We may share personal information, where necessary and lawful, with trusted service providers, professional advisers, regulators, funders, partner organisations involved in delivering services, payment processors, mailing or technology providers, and public authorities or law enforcement bodies. We require third parties processing personal information on our behalf to act only on our instructions and to keep the information secure and confidential. We do not sell personal information.

Where We Obtain Personal Information

We usually collect personal information directly from you. In some circumstances, we may receive information from family members or carers, referrers, partner organisations, public sources, fundraising research sources, or from publicly available registers and online sources where this is lawful and proportionate.

International Transfers

Some of our suppliers may process personal information outside the UK. Where this happens, we will take appropriate steps to ensure that personal information is protected and transferred in accordance with UK data protection law.

Protecting Non-Public Personal Information from Unauthorised Access

Safeguarding the confidentiality, security and integrity of your non-public personal information is very important to us. We have established systems, policies and procedures designed to protect your personal information physically, electronically and procedurally from being accessed by unauthorised persons. Employees are trained in our privacy policies and procedures, including the proper handling of client information. Employee access to non-public personal information is limited to those with a legitimate business reason for such access.

We require that all employees, financial professionals and third parties providing services on our behalf keep client information confidential.

Data Retention

We keep personal information only for as long as necessary for the purposes for which it was collected, including to meet legal, accounting, safeguarding, funding and regulatory requirements. Retention periods vary depending on the type of information and the reason we hold it. In many cases, we retain records for at least six years after the end of the relevant relationship or our last substantive contact with you, unless a longer or shorter period is required or justified. When information is no longer needed, we will securely delete, anonymise or otherwise dispose of it.

Data Privacy Rights

You have rights in relation to your personal information, subject to the circumstances and any legal exemptions. These may include the right to be informed, to request access to your personal information, to ask us to correct inaccurate information, to request erasure, to request restriction of processing, to object to processing, and in some circumstances to receive a copy of your personal information in a portable format. Where we rely on consent, you also have the right to withdraw that consent at any time. To exercise your rights, please contact Steve Barnes, Chief Executive steve.barnes@bromleymencap.org.

Prospect Research and Wealth Screening

As a fundraising organisation, we carry out targeted fundraising activity to ensure that we are contacting people with the most appropriate communication, which is relevant and timely and will ultimately provide an improved experience for you.

To support our fundraising work, we may carry out proportionate prospect research, screening and profiling to help us understand our supporters and potential supporters, tailor our communications and plan fundraising activity appropriately. This may include manual review and, where appropriate, the use of trusted third-party screening or research providers. Information used for this purpose may come from you, from our own records, and from publicly available sources such as Companies House, charity registers, published biographies, media reports and professional networking sites such as LinkedIn. We do not make solely automated decisions that have legal or similarly significant effects on individuals for these purposes.

We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch.

We may also use publicly available information to carry out appropriate and proportionate due diligence on donations and supporters, in line with our gift acceptance and risk management processes and to help us meet legal and regulatory obligations.

If you would prefer us not to use your data in this way, please email us at enquiries@bromleymencap.org or call us on 020 8466 0790.

Changes to this Notice

We may update this privacy notice from time to time to reflect changes in the law, our services, our fundraising practices or the way we handle personal information. The latest version will be made available on our website.

Updating personal details

If any of the information that has been provided to us changes, for example if you change your email address, please let us know by sending an email to enquiries@bromleymencap.org

What if I have a question?

Please email Steve Barnes steve.barnes@bromleymencap.org if you have any questions about this privacy notice or how we handle your personal information. If you are unhappy with how we use your information, we would appreciate the chance to address your concerns first, but you also have the right to complain to the Information Commissioner's Office.