

Privacy & Cookie Policy

Baby Loss Awareness Week is produced and owned by the charity Sands.

By agreeing to be contacted by Baby Loss Awareness Week, you are agreeing to have your data stored and protected by Sands.

We make it easy for you to tell us how you would like to receive information, as we want you to be completely comfortable with how your personal data is gathered and used. We promise to contact you in a way that works for you, and will only contact you about Baby Loss Awareness Week, unless you agree to be contacted by Sands directly. We also follow all applicable fundraising and data protection legislation and guidelines.

1. What this Privacy and Cookie policy covers

We ensure, as a minimum, that we use your data in accordance with all applicable laws concerning the protection of personal data. This policy explains:

What data Sands/Baby Loss Awareness Week may collect about you.

How we will use that data.

Whether we disclose your details to anyone else.

How we manage your personal data – security, storage and retention.

Your choices regarding the data you provide to us.

How we use cookies to provide services to you or to improve your use of our websites.

2. Questions and changes to this policy

Any questions you have in relation to this policy or how we use your personal information should be sent to dataprotection@sands.org.uk or addressed to:

Sands Data Protection,
Supporter Care Team,
Sands,
Victoria Charity Centre,
11 Belgrave Road,
London, SW1V 1RB.



Please note that from time to time we may need to amend or update this policy, for example if there is a change in the way that we use personal information or because of updates to the law. You should periodically check this website to make sure that you have seen the most up to date version of this policy.

3. About Sands

Your personal data (which is any data that identifies you, or which can be identified as relating to you personally) is referred to as 'personal data' in this privacy policy and will be collected and used by Sands (Stillbirth and Neonatal Death Society) 'we', and known as the 'data controller'.

For the purpose of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), which comes into force on 25 May 2018 to replace the Data Protection Act 1998 (the Act), the data controller is a charitable company limited by guarantee in England and Wales under Company Number 2212082 Charity Number in England and Wales 299679 and in Scotland SC042789 and have our registered office at Victoria Charity Centre, 11 Belgrave Road, London, SW1V 1RB. Sands (Stillbirth and Neonatal Death Charity). This policy (together with our terms of use and any other documents referred to within it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our safeguards and practices regarding your personal data and how we will treat it.

4. Information we collect from you and how we use it

4.1 Information you give us

This is information about you that you give us by filling in forms on the Baby Loss Awareness Week site or by corresponding with us by telephone, post, email or otherwise. It includes information you provide when you register to use the Baby Loss Awareness Week site, participate in discussion boards, private messaging or other functions on the site, and when you report a problem with the site. The information you give us may include your name, email, address and telephone number and other information as you choose to disclose.

4.2 When you give us information

When you engage with us we may ask for personal information when you: make a donation to us, register for an event or a campaign, subscribe to a newsletter, engage with our social media, communications or support, information and training services, or provide us with personal information in any other way. This information may include:

Your name, postal address, email address and telephone number.



Financial data (Such as bank account details provided by you and whether donations are gift-aided. See Section 12.)

A record of the financial donations that you have made and data about your tax status for Gift Aid purposes. Baby Loss Awareness Week is not a Charity in its own right, so any Gift Aid will be claimed by Sands.

Details of your indicated interests, opinions, preferences and the ways you support or have supported us – e.g. in relation to any campaigns, events or fundraising activities you have participated in. When you receive a communication we may collect data about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

When you provide your personal information to Baby Loss Awareness Week, please ensure that it is accurate and up to date. This will allow us to contact you effectively and efficiently in order to deal with your donations, fundraising, support, information or training questions/needs or provide you with data about our work. Please get in touch if you would like to change the personal details that we hold about you by contacting our Supporter Care Team at the address provided below.

4.3 When you use the Baby Loss Awareness Week website

When you use the Baby Loss Awareness Week website, Sands may use a third party service to collect standard internet log information and details of visitor behaviour patterns.

We do this to find out things such as the number of visitors to the various parts of the site. We process information in a way that does not identify anyone. We do not make, and do not allow any third party to make, any attempt to find out the identities of those visiting our website.

When filling out a registration form, making a donation, sharing your story via webform, communicating with us, signing up for, or receiving a service on our websites, you are providing us with your personal details. We will collect this data and store it in your record, fulfil your request, answer your enquiries and keep a record of our correspondence with you.

Our website uses cookies.

Cookies collect small amounts of data, obtained from the computer or device through which you access our websites. They store information about such computer or device and your preferences so that our websites do not have to keep asking you for them.

We use cookies on our Baby Loss Awareness Week website as follows:

The form used on the Baby Loss Awareness Week Online Shop will collect data – such as your name, email and postal address – that will allow Sands to identify you on each occasion that you make a purchase or make a donation. Our other online forms also allow us to do this in order to help us



provide certain information about you when you complete them. This may help to automatically fill in information about your name, or your contact preferences.

To allow us to collect statistical and performance data about how the website is used. We may collect geolocation data about your geographic location, the mobile device that is used and to confirm what browser you are using, and computer operating systems that are being used. This data doesn't contain any identifiable information about people. We use this data to improve the functionality of our website and ensure you have a good experience when browsing it.

Facebook, Twitter and LinkedIn pixel cookies are used to collect data about which different sections of the website are accessed by people who are registered users of these social media services. These service providers collect this data, which then allows Baby Loss Awareness Week to reach new audiences. Sands only has access to aggregated data from these companies, not identifiable personal information.

When a supporter creates a fundraising page or makes a donation through a third party platform, we will store the data about the donation and who sent it.

4.4 Links on our website

Our site may, from time to time, contain links to third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

For further details about this, see our Cookie Policy.

4.5 When you use social media

When you view content published by Baby Loss Awareness Week using social media hosted across various platforms, we will collect and receive information that provides aggregate data relating to items such as video views, demographics and location data. Sources of this data may include:

- Instagram
- Facebook
- Twitter
- LinkedIn
- YouTube
- Vimeo
- Pinterest

Identifiable personal information about people who access these platforms is collected in order to allow Baby Loss Awareness Week to reach and market new audiences.



We may sometimes collect additional data about you from other organisations or companies that provide data from publicly available sources, so we can make it easier for you to support Baby Loss Awareness Week, by providing you with details about the types of activities and services we can offer.

We ensure that such data is only collected from legitimate sources on a lawful, fair and transparent basis in accordance with applicable data protection law.

4.6 When you use the Baby Loss Awareness Week online shop

Where you make an order from Baby Loss Awareness Week shop or make a donation, we will process your personal data to provide these services to you. Our use of your personal data in this way includes, in particular, passing your personal data through our secure database that generates your contact record. We need to process your personal data in this way to record and track your donations and orders.

5. Disclosure of your information to third parties

We may disclose your information to third parties if we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use or to protect our rights, property, or safety of our users, or others.

We may also disclose when one or more of the following apply:

If you have specifically agreed that we may share your personal information to those third parties or individuals for a particular purpose.

When we use other companies (known as 'data processors') to provide services on our behalf who are only processing personal information in accordance with our instructions. For example, companies that provide: direct mailing or marketing services that send material to you by post, email or text message, customer analysis, assessment, profiling and when using auditors or advisors. Also, we may use third party organisations (again processing data under our instructions) to carry out fundraising on our behalf. For example, we may use a company to call supporters who have agreed to be contacted by telephone about a campaign, appeal or donations.

Baby Loss Awareness Week or Sands may use Facebook, Twitter and LinkedIn targeted advertising that involves sharing selected supporter information with these social media platforms to create new audiences for advertising. The process is secure and Facebook, Twitter and LinkedIn delete the personal information sent to them once new audience profiles of their users have been created. No new personal information would be added by us to your supporter record as a result of this.

Processing credit/debit card payments. Sands does not handle or store credit/debit card data itself, but uses secure debit and credit card processing services that are provided by Smart Debit, Sage Pay in accordance with Payment Card Industry (PCI) standards. Debit and credit card data will be



collected directly by these card processing service providers when you make a donation to Baby Loss Awareness Week or buy something using the Baby Loss Awareness Week Shop.

We may disclose aggregate statistics about our supporters and online shop sales to describe our services and operations to prospective partners, advertisers, other reputable third parties and for other lawful purposes – these statistics do not include any information that identifies people.

6. Information created by Sands

6.1 Internal supporter research and profiling

We complete research by analysing the success of our campaigns and events to identify patterns, trends and areas for future development. Having this information allows us to better understand our supporters, improve our relationship with you and provide you with a better supporter experience. By doing this, we ensure supporters are only provided with the communications, products and data which are important to them, and that our charity resources are used in a cost effective way.

To achieve this, we analyse and research supporter data to group people together in terms of common characteristics in order to offer you more relevant and tailored information, advertising, services and communications.

We keep track of the amount, frequency and value of each person's support. If, based on data that has been provided to us (such as geographical location, demographics, or previous donations), it appears you may be willing and able to provide more to support the mission of Baby Loss Awareness Week, then we may contact you to see if you wish to do so.

We may also obtain data from other sources, which is available on public and commercial databases. This may include obtaining data related to life-style and socio-economic categories. This data is analysed and modelled with a view to creating clusters of supporter types. Attributes are not personalised to individuals, but are modelled assessments that ascribe a generalised score or measure to supporter records found in each cluster.

We may also conduct supporter research that includes collecting data from public sources about a limited number of supporters who we think can influence policymakers to promote the interests of bereaved families and who could affect change that could help reduce the number of babies dying. We may also research supporters who we believe can become significant financial supporters of Baby Loss Awareness Week's mission, including well-known or influential people. We make sure that the sources we use are reputable public databases such as Companies House, mainstream news outlets or other reliable media sources. These sources may include:

192.com

Civil Society and Fundraiser Magazine

Trustfunding



Help us break the silence around pregnancy and baby loss
#BLAW #BabyLoss

Electoral Commission

Management Today

Sunday Times Rich Lists

We will make sure that we do not use data about individuals that is clearly intended to be private or collect information in a privacy intrusive manner that would not reasonably be expected by you. We will also inform you of this use as soon as is reasonably possible.

7. Sensitive or special category information

Sands may collect what's known as 'special category' or 'sensitive' personal information about supporters – this includes data relating to someone's health or type of bereavement they have experienced mainly - but also occasionally ethnic origin, religious beliefs or political affiliation. On the occasions when Sands does collect this type of sensitive personal information, it will be for specific activities, research or events.

For example: A sponsored marathon race or other fundraising activities, such as trekking. We will however only collect this data with your consent, usually with the aim of providing you with the necessary support and assistance to allow you to safely participate in these types of event (for example, information about health).

OR

There may also be occasions when you share a story or experience about yourself and/or a bereavement that includes sensitive personal information relevant to Baby Loss Awareness Week's mission that can be used in a campaign or related marketing of a particular service or activity. When your information is collected in this way, we will always tell you how your information will be used and obtain your explicit consent to use it in this way.

8. Children

Sands or Baby Loss Awareness Week will not knowingly contact anyone under the age of 18 to ask them for donations or other forms of financial contribution.

We may however send a 'thank you' administrative communication to the child if they have fundraised in support of Baby Loss Awareness Week which may or may not be sent via the parent or guardian depending on the contact information submitted.

9. Legal Basis

Sands relies on the following legal conditions that are described in the EU General Data Protection Regulation to use your personal information in the ways described in this privacy notice:



Consent: when you consent or opt-in to receive information and marketing by email. We use this consent to offer you marketing using email as well as targeted advertising, including through social media sites, such as Facebook, Twitter and LinkedIn.

Legal obligations: where we are under a legal obligation to process your personal data for a particular purpose. For example, obligations we have to hold information about donations or manage Gift Aid information in compliance with applicable tax laws. We may also sometimes need to process personal information for the purpose of us being able to establish or exercise our legal rights or to defend legal claims.

Legitimate interest: where we have a legitimate interest. This is the legal basis that we rely on to send information and marketing by email, post or telephone when you take part in supporting Baby Loss Awareness Week's mission by making a donation, or requesting information about our work, marketing, campaigns and events or other services.

We will also have a legitimate interest in being able to use and process personal information for internal administrative purposes, and when it is necessary to take measures to protect our IT network and data security or to protect ourselves (and our beneficiaries and supporters) from risks to our charity such as fraud, criminal conduct or reputational damage. When processing your personal information based on a legitimate interest, we will make sure that it is exercised proportionately and is always balanced against the privacy rights and other legal rights you have as an individual.

Contract: where we agree to provide any products and/or services to you, we will use your personal information in order to arrange for the provision of those products and/or services as well as performing obligations to you or enforcing our rights under any contract we have with you.

If we are processing any personal information that is regarded as 'special category' or 'sensitive' as referred to above, we will only do this with your explicit consent; or, where needed to protect your vital interests (or those of someone else) in an emergency; or, where you have already publicised such information (such as your political affiliations); or, where we have a need to use such data in connection with a legal claim relevant to us; or, if you have provided to us information relating to your experience of the loss of a baby to ensure you are targeted with the right services and information.

9.1 Marketing, campaigning and fundraising

We provide direct marketing, campaigning and fundraising communications to supporters, which includes news, information and data about:

Baby Loss Awareness Week and our work with bereaved families, healthcare and other professionals; research, policy and influencing; improving bereavement support and bereavement care; and related events and campaigns.



Campaigns to support bereaved families; raising awareness of the issues concerning bereavement care and bereavement support; issues and factors relating to safer pregnancy; and research, policy and practice at local and national level relating to reducing the numbers of babies dying and improving bereavement care.

Online and paper petitions relating to campaigns.

Opportunities to volunteer (for example as part of volunteer activity, befriending, knitting, fundraising related support).

Appeals and fundraising (including donations, competitions, raffles and similar promotional activities).

Products and services offered by the Baby Loss Awareness Week Online Shop.

Leaving a legacy.

Newsletters and updates.

Baby Loss Awareness Week and Sands relies on donations and support from others to continue its work on behalf of bereaved families and creating a world where fewer babies die. Being able to contact you for marketing and campaigning reasons is an important part of our fundraising, change activities and purpose.

Fundraising and campaigning for improvement is an important part of our marketing and change activity, but we will not share your data with any other organisation, individual or company to allow them to use your personal information for marketing or campaigning purposes, unless we have obtained your specific, freely given, informed and unambiguous consent to do so.

9.2 Anonymised data

We may aggregate and anonymise personal information so that it can no longer be linked to any particular person. This anonymised data can be used for a variety of purposes (such as recruiting new supporters) or to identify trends or patterns within our existing supporter base. This data helps inform our actions and improve our campaigns, products, services and materials.

10. You are in control

You can change your personal information and preferences about how we contact you whenever you choose. - <https://www.sands.org.uk/about-sands/your-privacy/your-contact-preferences>

10.1 How to change or stop us contacting you by post, telephone, email or text message.

You can change or update your contact preferences at any time or contact our Supporter Care team at:

Sands Data Protection,



Supporter Care Team,

Sands,

Victoria Charity Centre,

11 Belgrave Road,

London, SW1V 1RB.

Or telephone 0203 908 5525 or email supportercare@sands.org.uk

10.2 How to unsubscribe from Sands email newsletters

If you have previously opted-in to receive email communications from Sands but no longer wish to receive email communications, please click the unsubscribe link at the bottom of any of our emails to be removed from our list or contact our Supporter Care Team.

11. How we protect your personal data

Sands considers keeping your information safe to be vitally important. We employ a variety of physical, organisational and technical measures to ensure we do this, and prevent unauthorised access to – or use or disclosure of – your personal information.

Electronic data and databases that contain supporter personal data are stored on secure computer systems and we manage who has access to that data (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures and policies which staff must follow when handling personal information.

All hard-copy records and data are managed securely in access-restricted storage.

11.1 Payment security

All electronic forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a debit/credit card to donate or purchase something online your debit/credit card details are transferred securely to our payment card providers Smart Debit and Sage Pay who comply with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council. We do not store any payment card information.

We cannot guarantee the security of your home computer or any information sent over the internet or any publicly accessible communications network and using any online communications services are at the user's own risk.

11.2 Where we store personal information:



Help us break the silence around pregnancy and baby loss
#BLAW #BabyLoss

Sands is based in the UK. Wherever possible we store our data in the UK or within the European Union (EU). Some organisations and companies that provide services to us transfer personal data to territories outside of the EU such as Canada, a country whose legal system the EU Commission considers to have adequate data protection standards, or to the United States which does not have such EU approval in relation to its data protection standards. However in that case, we will only allow such a transfer when there is recognised assurance, such as the service provider being a member of the EU-US Privacy Shield Framework (eg Facebook, Twitter, LinkedIn) or we have put other legally appropriate safeguards and/or contracts in place to ensure that your data is adequately protected in accordance with EU privacy standards.

11.3 How long we store data

We will only use and store personal information for as long as it is required for the purposes it was collected for.

We take all steps necessary to ensure that your information is treated securely and in accordance with this privacy policy.

Our data protection policy sets out the different periods we retain personal information for in respect of these relevant purposes in accordance with our duties under applicable data protection law. The criteria we use for determining these retention periods is based on various legislative requirements; the purpose for which we hold data; and guidance issued by relevant regulatory authorities including but not limited to the Information Commissioner's Office (ICO). Personal information that we no longer need is securely disposed of and/or anonymised so you can no longer be identified from it. Some personal information may be retained by us in archives for historical research purposes, although we will do this in a manner that complies with applicable data protection law.

We continually review what personal information and records we hold, and delete what is no longer required. We never store payment card data.

12. Your rights

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to dataprotection@sands.org.uk

Remember, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting our Supporter Care Team on 0203 908 5525 or at supportercare@sands.org.uk

This privacy policy was updated in February 2020.

