

Search & Prosper Privacy Policy

About this Privacy Policy

This Policy explains how we at Search & Prosper collect, process and store personal information about our clients' donors/supporters/contacts and potential donors/supporters (for brevity, '**client data subjects**'), and how we collect, process and use information about our clients and other business contacts.

We will share our Privacy Policy with our current clients, and with anyone else who requests it. We may review and amend the terms of this Policy from time to time. If we do this then we will inform and share the amended Policy with our clients and with any other relevant business contacts.

Who we are and what we do

Search & Prosper is a partnership in the UK, with registered office at 85 Winfold Road, Waterbeach, Cambridge, CB25 9QF. The partners of Search & Prosper are Elly Bohme and Julian Ruston. We provide major donor research and due diligence services to not-for-profit organisations, including (but not limited to) universities, colleges, schools, charities, arts and cultural organisations. We also provide major donor research and due diligence services to for-profit fundraising companies and consultants which they pass on to their clients.

Our commitment to data protection and privacy

At Search & Prosper, we are committed to protecting and respecting the privacy of all individuals and all forms of personal data. We comply with both the Data Protection Act 1998 (DPA) and with the General Data Protection Regulation (GDPR) which applies in the UK from 25 May 2018. Search & Prosper is registered with the Information Commissioner's Office (ICO) under the name of Elly Bohme; we have sent updates to the ICO regarding our registration which are currently being processed.

We aim to always be clear about how and why we collect and process personal information, and not do anything that you would not reasonably expect. All data is held securely and treated as confidential.

We follow accepted best-practice policies and procedures when processing data, undergo training around data protection issues, and keep up-to-date with latest legislation and regulation around data protection through news reports and updates from the ICO and relevant fundraising resources.

When we undertake major donor research and due diligence services, careful consideration is given to the personal rights of the data subjects. This is done through sensitive and respectful writing; and a commitment to verifying, where possible, that information we are including in our reports is accurate.

All the information included in our major donor research reports and Due Diligence reports are referenced with dates and information sources. Where the credibility or authenticity of a source or piece of information is doubtful, this is indicated within the report.

About whom do we process data?

Search & Prosper processes personal information about:

- Our clients' donors, members, alumni, other supporters and contacts (client data subjects)
- Our clients' potential donors and supporters (client data subjects)
- Data subjects of clients of for-profit fundraising companies / consultants with which we may work from time to time
- Our clients and potential clients, and some individuals that work for our clients
- Other individuals with whom we have or have had a business relationship or connection.

Our legal basis and purposes for processing personal data

When we are processing personal data for a client about their supporters and potential supporters, we are the Data Processor and the client is the Data Controller. We are putting in place Data Processing Agreements with all our clients so that both parties understand their responsibilities and liabilities.

Our primary purpose for processing personal data is to help not-for-profit organisations further their strategic and charitable objectives. We do this by assisting them in raising significant funds through the provision of thoughtful, carefully considered and targeted information, using publicly available information sources, about their supporters and potential supporters.

More specifically, our purposes for carrying out major donor research and due diligence services are:

- To help fundraisers, senior staff and trustees of our clients to understand, engage and build more meaningful relationships with individuals, companies, trusts, foundations and other potential funders.
- To help senior staff and trustees of our clients decide whether or not accept a particular donation. The Due Diligence research focuses on a screening of the donor's activities against the organisation's ethical policy; checks on any illegal activity; and highlights issues that are not illegal but may be deemed controversial and/or carry reputational risk for the organisation.

We only use the information we collect from publicly available sources to carry out the research and due diligence services we provide to clients. We do not collect and store personal information in the form of a database.

Our legal basis and purposes for controlling personal data

We act as a Data Controller in respect of data we hold on clients, their staff, potential clients and other business contacts. When we process data as a Data Controller, we rely on the following grounds for lawful processing:

- For the purposes of administering Services Agreements and Data Processing Agreements with clients.
- For the purposes of submitting invoices for work completed.
- For our marketing and other promotional activity. In these instances we process data because it is in our Legitimate Interest unless the law requires us to obtain your Consent, in which case we will only process data with your consent.

What data do we collect and process?

As Data Processors, on behalf of clients, we collect and process the following data on clients' supporters, potential supporters, members, alumni and other contacts (client data subjects):

- Name, date of birth and details of family members
- Business contact details – but we never contact the client data subjects ourselves
- Educational information / affiliations to educational organisations
- Personal / recreational interests
- Business and professional information, including career summary, current and past company directorships and any key professional achievements and awards
- Financial information related to the data subject's potential capacity to make a donation
- Philanthropic and charitable interests and affiliations, and other interests, including examples of past giving
- Contacts and networking information (family, friends, professional networks, club memberships and business contacts), to help clients find a way to reach out to a supporter or potential supporter
- Notes of meetings, correspondence and conversations which our clients may have had with the data subject
- Nature of the relationship with our client, including information about past giving to the client and hoped for future giving.

We collect the above information through our own research, using information sources in the public domain, and from our clients if they choose to share it with us.

As Data Controllers, for the purposes of carrying out administrative and marketing work for Search & Prosper, we hold the following information about our clients and business contacts:

- Name
- Employment and contact information
- Communications preferences.

Public domain sources

Publicly available sources we use to conduct research and due diligence include:

- Companies House
- Yahoo! Finance, Reuters and Digitallook.com (for corporate and financial information)
- Company websites
- Company / employer bios
- Company annual reports and annual returns
- Charity Commission, Guidestar, TrustFunding, US Foundation Directory and other databases containing searchable details of charities, trusts and foundations
- Annual reports of grant-making trusts and foundations
- Websites, donor listings, annual reports and donor reports of other not-for-profit organisations
- Rich Lists
- Philanthropy press
- Factiva (national and international press, and due diligence tools)
- Lexis Nexis (national and international press, and due diligence tools)
- General Internet and press searches
- *Who's Who* and *Debrett's People of Today*
- The Queen's Honours Lists
- Occasional access to databases such as Wealth-X
- LinkedIn.

Sensitive Information

We will avoid the collection and processing of information classified as 'sensitive personal data', unless:

- The client makes a special request and case for us to do so.
- The information has clearly been released into the public domain by the individual themselves, and is considered useful and not excessive for the purposes of our Services Agreement with the client.
- The information is reported by reputable press sources and warranted for the purpose of due diligence. For example, information such as details of legal proceedings or criminal accusations which will be considered as part of a client's due diligence and donor screening process.

Data disclosure

- Search & Prosper comprises two partners – Elly Bohme and Julian Ruston – who process and have access to the data. Search & Prosper does not have any employees, and we do not distribute the work to sub-contractors. Apart from the two partners, no other individual or organisation processes or has access to the data.
- Search & Prosper will not sell, share, transfer or disclose any data about clients or their data subjects to third parties, unless authorised to do so by the client (Data Controller) or if required to do so by law.
- Search & Prosper will never transfer data outside of the UK unless authorised to do so by the client.
- Search & Prosper may share basic contact details of client employees with business contacts, and vice versa, only with prior consent (for example for putting other consultants in touch with clients or potential clients if either has requested it and consent has been given).

Data security

We have a number of measures in place:

- Our email system and our folders/files on our computer system require two-step authentication.
- We always protect research, reports, spreadsheets and any other related data with passwords before sending them by Office365 email to the client.
- Paper records are rarely used; they are securely shredded after use.
- We never store the personal data of data subjects that we research on behalf of clients on portable laptops or mobile devices.
- We store basic personal contact information of clients and other business contacts on mobile devices which are protected with passwords and pin numbers.

The security measures we take to protect all personal data that we process will be reviewed on a regular basis. We will communicate any changes to our clients.

For how long do we retain the data?

Data processed on client data subjects is kept no longer than necessary. This means that, unless otherwise authorised by clients, client data will be permanently deleted from our servers no later than 3 calendar months following project completion – or earlier/later if instructed and authorised by the client.

We may keep a skeleton record of work completed for the purposes of invoicing and for our clients' and our own historical records.

For administering our own business, we retain basic personal data and contact details of client employees whilst clients are working with us and for a reasonable time beyond until such time as repeat business seems unlikely. A client or past client may ask to be removed from our contacts database at any time by getting in touch with us by mail, phone or email. On receipt of such a request we will remove them immediately from our database.

Your rights

You have a number of rights in respect of your data:

- You have the right to request a copy of any data we hold about you.
- You have the right to ask us to stop processing your data and you have the right to ask us to remove your data from our systems.
- If you are a current or past client/business contact, you have the right to let us know how you wish to be contacted (by mail, phone, text or email); you have the right to ask us to stop contacting you altogether; and you have the right to ask us to remove your data from our systems.
- Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a skeleton record of personal data (name and organisation), to ensure we do not contact you inadvertently in future.
- You have the right to complain directly to us about the way in which we process your data.
- You also have the right to complain to the Information Commissioner about the way in which we have processed data. Contact details are at: <https://ico.org.uk/>

You can contact us to exercise your rights, outlined above, by getting in touch with us as below.

How to contact us

Search & Prosper (Elly Bohme or Julian Ruston)
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CB25 9QF
Tel: 01223 528625
Email: info@searchandprosper.co.uk

Last updated on: 31 May 2018