

Privacy Notice: V1.5 29.04.25 – Reviewed Bi-Annually

This privacy notice relates to The Drinks Trust and any subsidiary or supporting brand of The Drinks Trust including the Business Advisory Programme online platform (a service of The Drinks Trust). It explains how we process your personal information whether you are a donor, member, business partner, attend a Drinks Trust Event, beneficiary, patron, trustee or choose to be an individual member or ambassador. It explains how we will protect your information and personal data, and the controls and safeguards we provide for this data. This should help you to understand precisely what data we are storing for and about you, who (if anyone) can see that data, and how you give permission for that data to be shared with third parties.

The processing of personal data, such as the name, address, e-mail address, or telephone number shall always be in line with the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communication Regulations (PECR).

By means of this data protection declaration, we would like to inform you of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

Who are we are:

The Drinks Trust's mission is to provide help and support to current and former employees of the drinks industry and their families. Our vision is a world without medical, financial or personal hardship for colleagues in the drinks industry and their families.

Our goals are:

- To provide practical, emotional and financial support to those from our industry at every stage of their career
- To work in partnership with the drinks industry to help colleagues facing issues such as financial hardship, loneliness, serious illness and disability in our community.
- To be a valuable partner to the companies of the drinks industry to actively support their current and former employees in need.

We are registered as a data controller under registration number **Z7844540**.

The information we collect, why we need it and who it is shared with:

The personal data we may collect from you and process includes (but is not limited to):

- Personal contact details such as name, address, telephone, email, social media contacts.
- Personal information such as gender, ethnicity, number of dependents.
- Other sensitive personal information such as criminal convictions.
- Information about your current / past employment situation and your current/ past employer.
- Personal Financial information.
- Other personal background information.

The personal data we collect may be used for some of (but not limited to) the following purposes:

- Sending you information about The Drinks Trust, our activities (including our fund-raising activities), our campaigns, supporters and beneficiaries and for marketing purposes (including via Meta (Facebook and Instagram), X (formerly known as Twitter), LinkedIn and TikTok).
- Processing a donation that you have made.
- Manage and use any contributions you provide to us, whether via our website or otherwise for our campaign purpose or our activities.
- Processing your records as an employee, patron or trustee.
- Responding to application for support or and providing support in line with our charitable objectives.
- Responding to correspondence you have sent to us.
- We are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

The legal basis for processing for your personal data:

- Legitimate interests.
- Consent.
- To meet legal obligations.
- Any other lawful basis.
- To impart essential information such as change of address.

Processing through use of our Legitimate Interests

Broadly speaking Legitimate Interests means that we can process your personal information if:

- We have a genuine and legitimate reason, and we are not harming any of your rights and interests.

The legitimate interests we pursue are to run a charity that provides the well-being of our beneficiaries, donors, stakeholders, employees and trustees.

When you provide your personal details to us, we use your information for our legitimate interests to carry out our work providing help and support to current and former employees of the drinks industry and their families in the UK. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

Some typical examples of when we might use this lawful basis are for direct marketing via post or text marketing, maintaining the security of our system, data analytics, enhancing, modifying or improving our services, identifying usage trends and determining the effectiveness of our campaigns and fundraising.

Direct marketing is generally seen as an important tool, but we want to respect the wishes of recipients of our marketing. For this reason, we have undertaken a balancing test to compare our legitimate interests versus your interests and indeed fundamental rights and freedoms, which require the protection of personal data.

We believe that the recipients of our marketing have a reasonable expectation that The Drinks Trust will store and process their Personal Data.

Our assessment has also considered the technical and organisational security measures that The Drinks Trust has implemented, and the safeguards being put in place in regard to your privacy and the protection of your personal data.

The Drinks Trust routinely conducts Data Protection Impact Assessments with outputs that include:

- data minimisation
- de-identification and anonymisation
- appropriate technical and organisational security measures
- privacy by design and default
- adding extra transparency
- encryption and access control
- data retention limits
- restricted access
- where appropriate encryption, hashing, salting
- other technical security methods used to protect data.

The likelihood of impact and the severity of negative impact of our processing on your data has been assessed and deemed to be negligible.

Processing using Consent.

There are certain circumstances, particularly in regards electronic marketing & fundraising communications where we are likely to need consent from you, in order to process your data.

If this is the case, we will take every step to ensure that the consent that you provide is by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data relating to you.

Email Marketing, Fundraising donations and Legacy pledges

In relation to any email or digital marketing that you may receive from us, either at your request or in any other circumstances, we may monitor whether you open and/or click on any links in such emails and we use various tracking techniques to measure the effectiveness of our email campaigns and tailor our communications to your interests.

If you agree to receive news from us via email, we will contact you via this media based on our judgement of legitimate interest or consent. We use Microsoft Outlook for our email program which is protected by a 2-factor authentication process; we also send emails from our CRM which is cloud-based with servers in the UK and provides GDPR compliant security measures. We also use MailChimp, a US-hosted third-party provider to send out and monitor our communications. For more information on which platforms we use and the security in place please see below. We may use other methods of contacting you, if they are judged to be recognised as secure methods of communication.

We will also undertake to ensure that any transfer of data outside of UK is subject to Standard Contractual Clause (or SCC) in accordance with current UK legislation.

If you no longer wish to receive emails, you can unsubscribe by following the instructions in the relevant communication.

Where we have your permission, we may invite you to support our vital work in a variety of ways including (but not limited to) making a donation, buying a raffle ticket, getting involved in fundraising activities or leaving a gift in your will.

Occasionally, we may invite some supporters to attend special events or to find out more about the ways in which donations and gifts in wills can make a difference to specific projects and to our cause. We will also send you updates on the impact that you make by supporting us in this way, unless you tell us not to.

We may also share information about our new initiatives or services, or information about related party providers or events that we believe may be of interest or benefit to you. If you do not wish to receive this information you may notify us to cease communication of this nature at any time.

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If you make a donation, we'll use any personal information you give us to record the nature and amount of your gift, claim gift aid where you've told us you're eligible and thank you for your gift. If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause as an ambassador, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts.

If you've told us that you're planning to, or thinking about, leaving us a gift in your will, we'll use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this.

If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we'll note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you wanted.

Charity Commission rules require us to be assured of the provenance of funds and any conditions attached to them. We follow a due diligence process which involves where necessary, researching the financial soundness, credibility, reputation and ethical principles of donors who've made, or are likely to make, a significant donation to The Drinks Trust.

Where we have been notified, we will always act upon your choice of how you want to receive marketing or fundraising communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a donor, beneficiary, stakeholder, or supporter of The Drinks Trust.

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Who your information is shared with / who shares your information with The Drinks Trust?

The Drinks Trust will share your personal data with third parties only for the purposes of sub- contracted essential processing and vice versa. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

| Organisation | Purpose | Country (non-EU)/international organisation | Safeguards in place to protect your personal data | Retrieve a copy of the safeguards in place here: |
|--|---|---|---|---|
| ExpressionEngine (operated by Symphony Online) | CMS used by The Drinks Trust to host its website platform | UK | n/a. Personal data is not handled on ExpressionEngine | n/a. Personal data is not handled on ExpressionEngine |
| ExpressionEngine (operated by Symphony Online) | BAP Platform | UK | Data is stored on a UK based server and is stored in line with GDPR requirements. | https://www.symphonyonline.co.uk/privacy-policy/ |
| Hubspot | Email Communication Delivery for The Drinks Trust | United States (US) and Germany | Cloud Hosting: HubSpot's services are hosted on reputable cloud providers like Amazon Web Services (AWS), which maintain SOC 2 Type II and ISO 27001 certifications, ensuring high standards of physical and environmental security. HubSpot complies with various data protection regulations, including GDPR, CCPA, and HIPAA, providing tools and features to help customers meet their compliance obligations. See Privacy Statement... | https://www.hubspot.com/data-privacy/gdpr |

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| Support Line | Provide help and support to those who contact the Support Line | UK | Data is held by Spectrum.Life under the terms of their own privacy notice. If contact is made to the service via WhatsApp this is subject to WhatsApp data processing arrangements and privacy notice | https://faq.whatsapp.com/general/security-and-privacy/answering-your-questions-about-whatsapps-privacy-policy/?lang=en |
| Dr Julian Counselling Services | Referral to Dr Julian counselling services for beneficiaries | UK | Data is collected by The Drinks Trust and shared with Dr Julian counselling services for referral purposes. Data is subject to a Data Processing Agreement. | https://dr-julian.com/terms-and-conditions/ |
| Beacon CRM | Holds all key data for donors, beneficiaries and contacts of The Drinks Trust. Also collates details about Equal Measures applicants. | UK | Data is held in Beacon cloud CRM system which operates in accordance with UK GDPR law with encryption and limited access. Servers are UK based. | https://www.beaconcrm.org/gdpr |
| Hootsuite | Information is collected and processed using this platform | UK | Several firewalls and internationally recognized safety mechanisms. | https://www.hootsuite.com/legal/general-data-protection-regulation |
| GoogleDocs | Storage of event forms. | https://policies.google.com/privacy?hl=en-GB#info retaining | User data for event sign up forms is stored in Google Docs. | https://policies.google.com/privacy?hl=en-GB#info security |

Our website uses cookies, this is what they do and how you can stop them:

You do not have to give us any personal data in order to use this website. However, you may provide us with personal data by completing forms on this website or by contacting us by telephone or email.

When you visit this website, we will automatically collect the internet protocol (IP) address of the device used by you to visit this website as well as the type of the device, browser version and time zone setting. This will enable us to identify you as a unique user for analytical purposes and to optimise our website for your device. This data does not allow us to, and we will not attempt to use this data to, identify you.

Cookies

This website uses small text files, called cookies, which are automatically stored on your device when you access and use certain features of this website. As cookies are unique, we can use them to distinguish you from other users. To find out more about cookies, how to refuse them and how to change your device's

cookie settings, you should visit [All About Cookies](#).

Please note that if you refuse to accept cookies or change your device's cookie settings, you may not be able to use all of this website's features.

Data collected from the use of cookies does not allow us to, and we will not attempt to use this data to, identify you.

The categories of cookies used by this website are as follows:

- Strictly necessary cookies
- Performance cookies
- Advertisement cookies
- Analytics cookies

The cookies used by this website are as follows:

Google Analytics

| Source | Cookie | Description |
|------------------|---------------------|--|
| Google Analytics | utma | This cookie creates a unique ID when a new visitor browses our website. It helps us to assess the number of new visitors to our site, and also identify whether we are receiving repeat visitors, too. |
| | utmb | These two cookies help us measure a visitor's session, giving us data on what time visitors arrive and how long they spend browsing our website. |
| | utmc | |
| | utmz | This cookie gives us information about how a visitor got to our site (e.g. Google Search, referral site, social media, direct URL, etc.) and also which pages they viewed after they arrived. |
| | Double Click | This cookie collects anonymised Ad Views, Analytics, Browser Information, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains) |
| | Audiences | This cookie collects anonymous data (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains) |
| Meta Cookies | _fbp, fr | <p>Cookies are placed by Facebook. Functionality is to store and track visits across websites and to provide ad delivery or retargeting.</p> <p>The retention period of the cookies is 3 months.</p> |
| ExpressionEngine | exp_visitor_consent | Saves responses to Consent requests for non-logged in visitors 1 year Strictly Necessary |
| | exp_tracker | Contains the last 5 pages viewed, encrypted for security. Typically used for form or error message returns. Expires with the session and the type is |

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| | exp_csrf_token | functionality A security cookie used to identify the user and prevent Cross Site Request Forgery attacks. Expires after 2 hours, and it's strictly necessary |
| | _ga | Google Analytics, expires after 2 years, and it's a performance cookie |
| | _gid | Google Analytics, expires after hours, and it's a performance cookie |
| Cloudflare | | Cloudflare uses various cookies to maximize network resources, manage traffic, and protect our customers' sites from malicious traffic. |
| Hotjar | | Hotjar cookies are responsible for displaying the correct content to your users without personally identifying anyone. 365 days |

These cookies are used by the Google Analytics service to identify unique visitors to this website, where they came from, which pages they visit and how long they spend on it.

Further information can be found in the [Google Privacy Policy](https://www.facebook.com/policy.php); <https://www.facebook.com/policy.php>; <https://www.squarespace.com/privacy>, <https://expressionengine.com/about/privacy-policy>

Most browsers allow you to refuse to accept cookies, for example:

- (a) In Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- (b) In Firefox (version 39) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- (c) In Chrome (version 44), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

You can also delete cookies already stored on your computer, for example:

- (a) In Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
- (b) In Firefox (version 39), you can delete cookies by clicking "Tools", "Options" and "Privacy", then

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selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and

- (c) In Chrome (version 44), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

Social buttons.

Visitors may use these to bookmark or share our web pages. There are buttons for: X (formerly known as Twitter) Share, Facebook Share and Google Plus. These work using scripts from domains outside of The Drinks Trust and it is likely those sites will collect their own information about what you are doing. You should review the policies of each of these sites to see how they use your information and to find out how to opt out, or delete, such information.

Social Media Contact with The Drinks Trust: We use Twitter. If you intend to post a comment on our Twitter feed, Twitter will require you to set up your own account. Please review the [Twitter privacy notice](#) to see how it uses your information and to find out how to opt out, or delete, such information. Direct messages sent to The Drinks Trust's Twitter account will be deleted after 1 year.

Your privacy rights explained:

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you free of charge.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that The Drinks Trust refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

Other websites:

On occasion our website will contain links to other websites. This privacy policy only applies to The Drinks Trust's website. When you link to other websites you should read their own privacy policies.

Changes to our privacy policy:

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated May 2025.

How long we keep your personal data:

Any information provided by you will be retained for as long as necessary in connection with the purposes for which it was provided, for example, to respond to your enquiry and in accordance with our data retention policy.

In respect of any contact information stored within our customer relationship management (CRM) system, we will delete your details upon request and if we have not had any further communication with you within a period of three years.

Any information collected as a matter of general policy will be retained for a minimum of seven years.

Any information collected about you or your activity through the use of cookies will be retained for the time periods set out in the particular cookies policy.

In any case, once we have processed any information about you in connection with the purposes for which it was provided or collected, and after ensuring that we have met with legal and regulatory obligations, we will securely delete or anonymise (to the extent such information was capable of identifying you in the first instance) such information upon expiry of the above time periods.

How to contact us in regard to your rights or make a complaint:

In the event that you wish to contact us about how your personal data is being processed by the Drinks Trust (or third parties above), please contact our Data Protection Representative below.

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| | Data Protection Representative contact details |
| Contact Name: | Chief Executive |
| Address line 1: | Unit 4 Baden Place |
| Address line 2: | |
| Address line 3: | LONDON |
| Post Code | SE1 1YW |
| Email: | Dataprotection@drinkstrust.org.uk |
| Telephone: | 0203 700 1970 |

You may also contact us to discuss how your request for information has been handled or to lodge a complaint by contacting our CEO: info@drinkstrust.org.uk.

You have the right to lodge a complaint directly with ICO if you are not satisfied with the response from The Drinks Trust representatives.

Addendum: BAP Wellbeing Platform and Data Management

This Addendum supplements our existing Privacy Policy and applies specifically to the collection, use, and management of data through the BAP Wellbeing Platform ("the Platform").

All personal data is collected, stored, and processed in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Data Collection

The Platform collects and processes personal information provided directly by users, including but not limited to:

- Contact details (such as name and email address)
- Demographic information

2. Legal Basis for Processing

Under UK GDPR, the legal bases for processing your data may include:

- Consent (Article 6(1)(a)): where you have provided explicit consent for specific processing activities
- Legitimate Interests (Article 6(1)(f)): where processing is necessary for our legitimate interests in providing wellbeing support, provided these are not overridden by your fundamental rights and freedoms

3. Purpose of Data Use

Data collected via the Platform is used to:

- Deliver personalised wellbeing resources and support services
- Monitor engagement and outcomes of wellbeing initiatives
- Improve the Platform based on user feedback and aggregated insights
- Ensure safeguarding and appropriate support for participants.

4. Data Sharing and Access

Personal data:

- Is accessible only to authorized personnel who require it to deliver services and manage the Platform
- May be shared in anonymized or aggregated form with relevant stakeholders for reporting and service improvement

5. Third-Party Processors and Data Processing Agreements

Where we engage third-party service providers (such as cloud storage providers, data analytics platforms, or wellbeing service partners) to process personal data on our behalf:

- We ensure all third-party processors comply with UK GDPR requirements.
- We have entered into written Data Processing Agreements (DPAs) with all such processors, obliging them to process personal data only in accordance with our instructions, maintain its confidentiality and security, and assist us in complying with applicable data protection obligations.
- We remain responsible for ensuring that third-party processors protect your data to the same standards that we do.

A list of significant third-party processors can be made available upon request.

6. Data Security

We implement appropriate technical and organizational measures, aligned with UK GDPR requirements, to protect the security, confidentiality, and integrity of your personal information against unauthorized access, disclosure, alteration, or destruction.

7. Data Retention

Your personal data will be retained only for as long as necessary to fulfil the purposes outlined above or to comply with legal obligations. When no longer needed, your data will be securely deleted or anonymized in accordance with UK data protection laws.

8. Your Data Protection Rights

Under the UK GDPR, you have the following rights:

- The right to access your personal data
- The right to rectification of inaccurate data
- The right to erasure ("the right to be forgotten")
- The right to restrict processing
- The right to data portability
- The right to object to processing
- The right to withdraw consent at any time (where processing is based on consent)
- The right to lodge a complaint with the Information Commissioner's Office (ICO).

Requests to exercise these rights can be made by contacting us at Dataprotection@drinkstrust.org.uk.

9. Updates to this Addendum

We may update this Addendum from time to time to reflect changes in our practices, applicable laws, or regulatory requirements. We encourage users to review it periodically.

How to contact us in regard to your rights or make a complaint:

In the event that you wish to contact us about how your personal data is being processed by the Drinks Trust (or third parties above), please contact our Data Protection Representative below.

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| | Data Protection Representative contact details |
| Contact Name: | Chief Executive |
| Address line 1: | Unit 4 Baden Place |
| Address line 2: | |
| Address line 3: | LONDON |
| Post Code | SE1 1YW |
| Email: | Dataprotection@drinkstrust.org.uk |
| Telephone: | 0203 700 1970 |

You may also contact us to discuss how your request for information has been handled or to lodge a complaint by contacting our CEO: info@drinkstrust.org.uk.

You have the right to lodge a complaint directly with ICO if you are not satisfied with the response from The Drinks Trust representatives.