# **Privacy Policy**

Sunrise Publishers Ltd is committed to complying with the provisions of the Data Protection Act and is registered with the Information Commissioner's Office, Number ZA251733. It is our policy to protect the personal information we collect through our own research or any information that is provided to us by third parties.

#### **Data Collection**

By using our website, and/or by providing any personal information to us, you consent to the collection and use of your personal information as set out in this Privacy Policy. Information that you supply to us about you or your organisation, whether via our website, by email, or by other means, will be securely stored by us. We will use this information for the purposes of communicating with you for any business we are conducting with you, and to inform you about our services. This may include adding you to our mailing lists. You may opt out of any of our mailing lists at any time by emailing marc@sunrisepublishers.com with a note of your requirements. We will not disclose your contact information to anyone who is not an employee or contractor of Sunrise Publishers Ltd unless we have your permission to do so, or are required by law to do so. You may ask us to delete your contact information at any time by emailing marc@sunrisepublishers.com. If we undertake work for you, we may name your organisation in a list of clients that we work with unless you request us not to do so.

#### **Rich List**

Our Rich Address List contains information on over 6,500 high net worth and well-connected individuals. These are likely to be UK millionaires in the top 3% of wealth nationally, all of whom we believe to be either capable of a personal gift or to open the door to a gift of £5,000 or more. It contains data gathered entirely from publicly accessible sources; including:

General internet searches; public registers of personal and corporate information; newspapers, newspaper supplements and journals; published directories and rich lists; online news archives; Charity Commission Register

We gather this information to provide services overwhelmingly for public benefit through the not for profit sector and other fundraising organisations to assist them in their fundraising, and elements of the information we collect are shared with such charitable, academic and arts organisations. We do not provide this service to private individuals. Wealth is estimated using figures from reputable sources such as published Rich Lists, and newspaper articles where available. We also look at company annual reports for remuneration and shareholdings, property values from newspapers and land registry/property websites and assets and donation values of personal charitable trusts to give an indication of personal wealth. We also consider other indicators such as club memberships, career history, location and number of homes, lifestyle, personal wealth of contemporaries, social networks and inheritance. We also note interests including environment, health and disability, medicine, children and young people, international development, education, the arts, welfare, heritage, animal welfare, military, sport and other hobbies. Information regarded as sensitive data under the Data Protection Act is only collected where that data has been revealed by the individual concerned (for example, in a media interview).

# **Storing Data**

Our business depends on handling data confidentially. We have taken technical and organisational measures to ensure that all personal information remains secure at all times. Sunrise Publishers may use the services of subcontractors to ensure that your data is held in a secure environment. We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation; or in order to enforce or apply our terms of use for this website which includes exchanging information with other companies and organisations for the purposes of fraud detection and protection.

#### **Research Data**

Sometimes the use of our research services requires that we are sent personal data for the purposes of the service. We will sign a confidentiality agreement with you prior to receipt of any such data which includes the following provisions:

- All data that you send to us remains your property.
- All data sent to us by you will be treated in confidence.
- Our use of your data will be as Data Processor under the terms of the Data Protection Act.
- Your data will be stored on our secure server.
- No part of your data will be disclosed to anyone who is not an employee or contractor of Sunrise Publishers Ltd, either physically or verbally unless we are required to do so by law.
- We will securely delete data you send to us 12 months from receipt, or at any time on request.
- We may supply information or data on individuals, companies, or trusts and foundations to you.

### How to access your personal information

You have a right to know whether or not Sunrise Publishers Ltd holds any information about you (personal data) and a right to be provided with your information in accordance with the Data Protection Act. You can request your personal information by email to marc@sunrisepublishers.com or by writing to: Marc Thorne, Sunrise Publishers Ltd, Lanet Farmhouse, Lanivet, Bodmin, Cornwall PL30 5JL. We do not make a charge for this. It will help us to find your information if you can tell us something about the nature of your contact with us. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. For further information on the UK's Privacy Principles, you can visit the Information Commissioner's Office website.

# **Policy Updates**

We reserve the right to make changes to this Privacy Policy. Each time you visit this site you should read this Privacy Policy to check that no changes have been made to any sections that are important to you. This policy was last reviewed May 2017.