

Sunrise Publishers Ltd is committed to complying with the provisions of the General Data Protection Regulation and is registered with the Information Commissioner's Office, Number ZA251733

### **How we use personal information**

We use personal information to manage our business and conduct research to meet the legitimate needs of our clients the vast majority of which are drawn from the charitable and not-for-profit sector, and to send information about our products. Anyone whose personal information we hold has the right to object to us using it. They can do this at any time by telling us and we will normally stop using their personal information, or exceptionally, explain why we are not able to.

We collect the following types of personal information for research purposes: We use data gathered entirely from publicly accessible sources such as Companies House, the Electoral Commission, the Electoral Roll, the FCA, the Law Society, the Land Registry. Trade & Industry References, Professional directories, Charities Commission. Reference directories such as Who's Who, Debrett's People of Today, Debrett's Peerage, City of London Livery Company information, Trustfunding.org.uk. Print and broadcast media; newspapers such as The Telegraph, The Times and Sunday Times, City AM, magazines, rich lists. Internet; general google searches, company websites, online-only articles, social media, justgiving.com, linkedin.com

We publish some of this information in our monthly magazine WealthWatch and store some in our Rich List Database, which contains information on around 6,500 high net worth and well-connected individuals. The information we keep includes estimated wealth band as well as indicators of philanthropic, business and social interests. All information is from publicly accessible sources.

### **Legitimate Interest**

Sunrise Publishers is principally interested in helping organisations within the not for profit sector find major donors which is a lawful legitimate interest under the General Data Protection Regulation. How we collect and use data is clearly defined in this Privacy Policy. We collect publicly accessible data on individuals we believe are capable of making or influencing a sizeable charitable donation. These individuals are typically in the top 1%-3% by wealth in the UK and would reasonably expect to be contacted by charities that they already support, local charities or those where a common interest is revealed from the data available. Major donors expect not-for-profit organisations to be well informed. The privacy rights and interests of the data subject are not negatively affected; the data used is already easily accessible within the public domain. From time to time we undertake cleaning and updating of personal data, again using public sources of data and for cleaning, with the assistance of specialist third party providers

### **Sharing personal information**

We may supply information or data on researched individuals, companies, or trusts and foundations to not-for-profit organisations as part of our services, either directly or via our subscription-based WealthWatch magazine. Any such information or data

supplied by us will be from publicly accessible information sources only. The information is provided subject to conditions of use.

We may disclose personal information to third parties if we are under a duty to comply with any legal obligation; or in order to enforce or apply our terms of use either for this website or use of WealthWatch magazine, or other agreements; or to protect the rights or property of Sunrise Publishers Ltd. This includes exchanging information with other companies and organisations for the purposes of fraud detection and protection.

### **Know your rights**

Any individual whose personal information we hold has the right to:

Object to us processing it. We will either agree to stop processing or explain why we are unable to (the right to object)

Ask for a copy of their personal information we hold, subject to certain exemptions (a data subject access request)

Ask us to update or correct their personal information to ensure its accuracy (the right of rectification)

Ask us to delete their personal information from our records if it is no longer needed for the original purpose (the right to be forgotten)

Ask us to restrict the processing of their personal information in certain circumstances (the right of restriction)

Ask for a copy of their personal information, so it can be used for their own purposes (the right to data portability)

Complain if they feel their personal information has been mishandled. We encourage individuals to come to us in the first instance but they are entitled to complain directly to the Information Commissioner's Office (ICO) [www.ico.org.uk](http://www.ico.org.uk)

Ask us, at any time, to stop processing their personal information, if the processing is based only on individual consent (the right to withdraw consent).

If you wish to exercise any of these rights please contact:

Pat Thorne

Sunrise Publishers Ltd, Lanet Farmhouse, Lanivet, Bodmin, Cornwall PL30 5JL

Email:

[pat@sunrisepublishers.com](mailto:pat@sunrisepublishers.com)

Phone:

01208 832272

Pat Thorne is also Sunrise Publisher's Data Protection Officer

Occasionally it may be necessary to make changes to this fair processing notice.

When that happens we will provide an updated version at the earliest opportunity.

The most recent version will always be available on our website

[www.wealthwatch.co.uk](http://www.wealthwatch.co.uk)