

# Alfred Williams Charitable Trust

## Privacy Policy

The Alfred William Charitable Trust is committed to protecting any personal information that you share with us or information that is provided to us by other organisations. The purpose of this policy is to give you a clear explanation of what personal information we collect and how we collect, use and protect your personal information.

## What is personal information?

Personal information is any information about you from which you can be identified such as your name, address, date of birth, credit card details, IP address, photo or video image but it may also be anything that identifies you, for example, your biometric data. For service users, some of this data will be sensitive and relate to their health and wellbeing, ethnicity and religious views. By providing us with personal sensitive data you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.

THE ALFRED WILLIAMS CHARITABLE TRUST will only use your information in ways that you would reasonably expect. Sometimes we may undertake research, with your permission, to better understand people's expectations about how their data will be used.

THE ALFRED WILLIAMS CHARITABLE TRUST will always consider the impact of processing your data before any action is taken to ensure that it has no unjustified adverse effects.

## Information we may hold about you

Your information will only be collected, stored or processed where a specific purpose has been identified. This will fall into the following categories:

Information required to provide you with the grant making services that THE ALFRED WILLIAMS CHARITABLE TRUST provides:

- Grantee details and data held may include personal information such as name, address, contact details, date of birth, gender, ethnicity and religious beliefs, next of kin, etc collected by THE ALFRED WILLIAMS CHARITABLE TRUST and information received by us from other agencies, emails, images, audio and video recordings, correspondence, and services received, surveys, commendations, complaints and concerns.
- Personal Information to support a contractual arrangement – purchase of services or other formal agreement.
- Information required for to comply with legal obligations – for example, disclosure and baring service, charity commission submissions.
- Information required in the legitimate interest of the charity – for example, as a supporter of the charity it will be in the legitimate interest of both THE ALFRED WILLIAMS CHARITABLE TRUST and you as a supporter to keep you informed about the work of THE ALFRED WILLIAMS CHARITABLE TRUST.
- Information which you have provided us with your consent to process – for example, you may have given us your consent to process banking information for the payment of grants.

## How information is collected

### Information you provide directly to us

Information is given to us directly when, for example, you become a Grant applicant.

We will ask you to provide personal information. You may provide this on a form, during a discussion, by email or letter or by other means.

The details we ask you for will be directly related to the purpose for which they are required, for example: if you are a potential or actual Grantee then your records may include sensitive personal data.

### Information provided by third parties

Sometimes information will be provided indirectly through a third party, for example: through a donation website (e.g. Just Giving), from an organisation where you have given permission to share your data, or Grantee details may have been shared with THE ALFRED WILLIAMS CHARITABLE TRUST through other agencies.

Third parties must only supply THE ALFRED WILLIAMS CHARITABLE TRUST with your information if they have the correct lawful authority to do so. When you share your information with anyone you should check their privacy policy so you understand how they will process and share your data. You should also regularly check your security settings for online services with whom you share your data.

### Information collected from public sources

THE ALFRED WILLIAMS CHARITABLE TRUST may collect information from public sources such as Companies House, Charity Commissioners, social media profiles, newspapers and other published material. THE ALFRED WILLIAMS CHARITABLE TRUST may also carry out research into population demographics, geographic data or other areas which may impact on our future service delivery.

## How we use your data

The following gives examples of how data is used are:

- For the purpose of deciding on to whom to make charitable donations
- To ensure we maintain our responsibilities for quality and accountability
- For funding purposes
- To provide you with information, details or services that you request.
- To keep you informed about the work of the charity.
- To maintain a relationship with you as a supplier of services.

## How we will contact you

If you have told us how you prefer to be contacted then we will use your preferred method to contact you. This may be by post, email, telephone, text or another method you have requested.

We will comply with the requirements of the data protection laws.

We understand people may give us their contact details for a variety of purposes, but will only use them for marketing purposes if this was made clear at the time they were given and we received your consent.

## Sharing information

Grantee details may be shared with other parties for the following reasons:

- To make considered decisions on to whom to award funding grants
- To make sure we maintain our responsibilities for quality and accountability
- For funding purposes including to provide evidence that contracted services have been delivered. To fulfil a legal duty.
- To provide information to regulatory bodies.

We will always seek consent before identifiable Grantee details is shared for the purposes listed above.

### **Third party agencies**

THE ALFRED WILLIAMS CHARITABLE TRUST does not and will not sell personal details to third parties for the purposes of marketing.

Where possible, THE ALFRED WILLIAMS CHARITABLE TRUST will always choose to anonymise data before sharing with third parties.

THE ALFRED WILLIAMS CHARITABLE TRUST may be required by law to share data to comply with legislation, for example, to safeguard a child or adult at risk of harm, as a result of a court order, a request from the police who are investigating a crime or an investigation from other authorities, for example, a tax enquiry.

### **Safeguards to protect your privacy**

THE ALFRED WILLIAMS CHARITABLE TRUST takes data protection and information governance very seriously.

All THE ALFRED WILLIAMS CHARITABLE TRUST trustees receive formal training annually and are supported with resources, materials and advice to ensure that the organisation complies with the requirements of the various data management and protection legislation and best practice guidance. This includes the General Data Protection Regulations (EU) 2016.

THE ALFRED WILLIAMS CHARITABLE TRUST is registered with the Information Commissioners Office under registration number ZA429930. Your personal data will be kept confidential and secure and will, unless you agree otherwise, only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable Data Protection Laws and other regulatory requirements.

All access to data is restricted only to those who have appropriate authority.

Any mobile devices, computers and servers used by the Trustees of THE ALFRED WILLIAMS CHARITABLE TRUST are passworded and data is held securely.

Software versions used by the Trustees of THE ALFRED WILLIAMS CHARITABLE TRUST are updated to ensure they are supported and deploy up-to-date virus protection systems virus and malware advisory system.

THE ALFRED WILLIAMS CHARITABLE TRUST has a retention policy for all data stored or processed by the Trustees of THE ALFRED WILLIAMS CHARITABLE TRUST. The retention policy is decided and then reviewed. Information is only kept as long as it is required, or as long as there is a legal requirement to keep it. Information no longer required is disposed of in a secure manner.

THE ALFRED WILLIAMS CHARITABLE TRUST data is processed in the UK or the European Economic Area (EEA) on systems owned and controlled by the Trustees of THE ALFRED WILLIAMS CHARITABLE TRUST. By providing your personal data to THE ALFRED WILLIAMS CHARITABLE TRUST you agree to this transfer, storage and processing of such data.

## Your rights

Your rights are important to us, we recognise that you have the following rights:

- The right to be informed about your personal information we store and/or process
- The right of access to the information we hold about you and make a subject access request.
- The rights of erasure or restricted processing
- The right of portability – you may be able to ask us to give information we hold about you to another organisation.
- The right to object to the way in which we store or process your information
- The right to object to any automated decision-making process that we may use.

If you would like to exercise any of these rights, please contact the Data Protection Officer at [enquiries@jonathanpennand.co.uk](mailto:enquiries@jonathanpennand.co.uk) or telephone 01449 673355 or write to the Data Protection Officer at Firs Farmhouse, Fishponds Way, Haughley, Stowmarket, IP14 3PJ

## Other information

For the purposes of Data Protection Laws, the Data Controller is: Jonathan Penn, a trustee

Registered Charity Number 266652

You may contact the THE ALFRED WILLIAMS CHARITABLE TRUST Data Protection Officer at any time if you have any concerns or questions about how your data has been used. Contact can be made by emailing [enquiries@jonathanpennand.co.uk](mailto:enquiries@jonathanpennand.co.uk)

If you are not satisfied with the way THE ALFRED WILLIAMS CHARITABLE TRUST handles your request you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website at <http://www.ico.org.uk>