Stratford Town Trust
creating a vibrant and connected community

PRIVACY POLICY

The privacy and security of your personal information is extremely important to us. This Policy explains how we protect and manage any personal data which you share with us and that we hold about you, including how we collect, process, protect and share that data. This policy applies if you're a supporter of the Trust (trustee, member, beneficiary, donor, volunteer, tenant, customer, employee) or use any of our services, visit our websites, email, call or write to us.

How we obtain your personal data

Information provided by you

You provide us with personal data via online/email communication, post, or over the telephone. We collect personal data in connection with specific activities such as membership applications, grant applications, making a booking, donations, volunteering, conducting research, employment etc.
We will only collect the personal data that we need.
This personal data you give us may include name, title, address, date of birth, age, gender, employment status, demographic information, email address, telephone numbers, photographs, CCTV images, attitudes, and opinions.

Information we get from other sources

We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, for example, to verify your identity and to process a job application.

How we use your personal data

We use your personal data to process, manage and administer your grant/membership/ volunteering/job application. We undertake at all times to protect your personal data, including any health and financial details, in a manner within the requirements of the General Data Protection Regulations (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data in storage.
If you're a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.
Membership is only available to persons over the age of 18. There is no child, young person or family membership option. If any events are undertaken where children may participate, personal information may be collected to ensure their safety in accordance with our Safeguarding Policy. No marketing to children will be undertaken and image permission forms will be retained in accordance with our policy.

Using personal data for marketing purposes

If you choose to hear from us, we may send you information based on what is most relevant to you. This might be regarding volunteering, membership, or events. We will only send these to you if you agree to receive them and we will never share your information with companies outside the Town Trust for inclusion in their marketing. We do not collect any personal information about you when you visit our website. However, we do use cookies to collect information on how visitors use our website. If you agree to receive any information from us you can change your mind at a later date.

We may sometimes use third parties to capture some of our data on our behalf, but only where we are confident that the third party will treat your data securely, in accordance with our terms and in-line with the requirements set out in the GDPR.

Sharing information

We may share your information with our professional advisers.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Stratford Town Trust, our beneficiaries, or others.

This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

How long do we keep this information about you?

We will only use and store your information for as long as it is required and for the purposes it was collected. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

Where we store your personal data

Where you have provided your personal data in hard copy format, this will be stored in a paper based, locked and secure filing system in our offices.

Where you have provided your personal data online or by email, this will be stored on secure password protected computers and on a secure offsite back-up service.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through our website or by email, so any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to and from the websites of our partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Legal Basis of processing

Data Protection regulations permit the processing of your data under 6 different legal bases.

When processing your data, we rely on the following bases, depending on the purpose of the processing, and how we use it to communicate with you:

Consent basis: we rely on your consent when sending you information about our work.

Legitimate interest basis: we rely on legitimate interests when sending you information about membership events or fundraising appeals. When we do this, we will always provide you with easy ways to ask us not to send such information in the future.

Contractual basis: when you apply for a grant we will utilise your data in accordance with our terms and conditions to process your application and monitor your use of the grant if you are successful.

Legal obligation basis: We utilise this basis for processing data for gift aid, in our role as employer, and where necessary for regulatory matters.

As a small charity we would not process your data under the legal bases of Vital Interest or Public Task.

Your Rights as the Data Subject

Access to information
The General Data Protection Regulations (GDPR) as stated in The Data Protection Act 2018 grant you the right to access particular personal data that we hold about you. This is referred to as a subject access request. We shall respond promptly and certainly within one month from the point of receiving the request and all necessary information from you. Our formal response shall include details of the personal data we hold about you, including the following:

- Sources from which we acquired the information;
- The purposes for processing the information; and
- Persons or entities with whom we are sharing the information.

Right to rectification
You shall have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure
You shall have the right to obtain from us the erasure of inaccurate personal data concerning you without undue delay.

You, the data subject, shall have the right to obtain from us the erasure of all personally identifiable information as per the GDPR Policy.

Right to restriction of processing
Subject to exemptions, you, shall have the right to obtain from us restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, and is restricted until the accuracy of the data has been verified;
- the processing is unlawful and you oppose the erasure of the personal data and instead request the restriction in its use;
- we no longer need the personal data for the purposes of processing, managing and administering your grant, but it is required by you, for the establishment, exercise or defence of legal claims;
- you have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

Notification obligation regarding rectification or erasure of personal data or restriction of processing
We shall communicate any rectification or erasure of inaccurate personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, the data subject, with information about those recipients if you request it.

Right to data portability
You shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another organisation, without hindrance from us.

Right to object
You shall have the right to object, on grounds relating to your situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

Right to not be subject to decisions based solely on automated processing
We do not carry out any automated processing, which may lead to an automated decision based on your personal data.

Invoking your rights
If you would like to invoke any of the above data subject rights please write to us at Stratford-upon-Avon Town Trust, 14 Rother Street, Stratford-upon-Avon, CV37 6LU or email datalead@stratfordtowntrust.co.uk. You will be asked to provide the following details:

- The personal information you want to access;
- Where it is likely to be held;
- The date range of the information you wish to access

We will also need you to provide information that will help us confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

Once we have all the information necessary to respond to your request we will respond within one month. This timeframe may be extended by up to two months if your request is particularly complex.

Accuracy of information
In order to provide the highest level of service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

Important information

Questions and queries
If you have any questions or queries which are not answered by this Privacy Policy, or have any potential concerns about how we may use the personal data we hold, please write to us at Stratford-upon-Avon Town Trust, 14 Rother Street, Stratford-upon-Avon, CV37 6LU or email datalead@stratfordtowntrust.co.uk

Policy changes
This Privacy Policy is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We suggest that you review this Privacy Policy from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement.

If you have a complaint
If you have a complaint regarding the use of your personal date or sensitive information, then you can contact us by either:

- Submitting a complaint via the **Contact us** page on our website - https://www.stratfordtowntrust.co.uk/contact-us
- Writing to Stratford-upon-Avon Town Trust, 14 Rother Street, Stratford-upon-Avon, CV37 6LU
- Emailing us at datalead@stratfordtowntrust.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data either via their website, telephone or by writing to their address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk