

THE GRACE TRUST (Registered Charity 257516)

PRIVACY NOTICE

This privacy notice provides you with details of how we (The Grace Trust) collect, store and process your personal data.

1. DATA PROTECTION

It is very important that the information we hold about you is accurate and up to date. Please let us know if your personal information changes by emailing enquiries@thegracetrust.org.uk. If you are unhappy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioners Office (www.ico.org.uk). However, we would prefer you to contact us first if you do have a complaint so that we can try and resolve it for you.

Email: enquiries@thegracetrust.org.uk Telephone: 0203 301 3806

2. WHAT PERSONAL DATA WE COLLECT

Personal Data is any information capable of identifying an individual and does not include anonymised data. We may process certain types of personal data about you including:

- **Identity Data** may include your first name, last name, title, date of birth, gender, national insurance number, photographs
- **Contact Data** may include your home, work and/or billing address, email address(es) and telephone and fax number(s)
- **Financial Data** may include your bank account and payment card details
- **Transaction Data** may include details about payments between us and other details of donations made by you

3. HOW WE COLLECT YOUR PERSONAL DATA

We will obtain personal data about you whenever you:

- Transact with us by making a donation
- Subscribe to our mailing list or communicate with us by post, phone or email
- Complete a form on our website

4. HOW WE USE YOUR PERSONAL DATA

We will use your personal data for any one or more of the following purposes:

- Where it is necessary for our legitimate interests
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal ground for processing your personal data.

5. WHY WE PROCESS YOUR PERSONAL DATA

The table below sets out how we intend to use your personal data and the legal grounds on which we will process such data.

We may process your data for more than one lawful ground, depending on the specific purpose for which we are using your data

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new donor	<ul style="list-style-type: none"> • Identity • Contact • Financial 	<ul style="list-style-type: none"> • Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to complete a feedback survey	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary for our legitimate interests to keep our records updated and to study how donors interact with the Charity
To administer and protect the Charity and the brand	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Necessary for our legitimate interests for running the Charity and to prevent fraud • Necessary to comply with a legal obligation

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties including:

- Service providers who provide IT and system administration services
- Professional advisors including lawyers, bankers, auditors, insurers, financial advisors and corporate finance advisors who provide consultancy, banking, legal, insurance, accounting and financial services
- H M Revenue and Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we have to keep basic information about our donors (including contact, identity, financial and transaction data) for six years after they cease being donors for tax purposes.

In some circumstances, you can ask us to delete your data; see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing of your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please email us at enquiries@thegracetrust.org.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10. THIRD PARTY LINKS

Our website may include links to third party websites, plug-ins and applications, Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.