

DATA PRIVACY NOTICE 10 March 2018

1. Your personal data – what is it?

Personal data relates to any information of a person who can be directly or indirectly identified by reference to that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

Milton's Cottage Trust CIO is the data controller. This means we decide how your personal data is processed and for what purposes. Milton's Cottage Trust CIO is located at 21 Deanway Chalfont St Giles HP8 4JH. We are a registered charity with the Charity Commission in England and Wales with registration number 1163039. Where particular contracts require, Milton's Cottage Trust CIO acts as data processor and complies with the same regulations in such cases.

3. How do we process your personal data?

Milton's Cottage Trust CIO complies with its obligations under the "GDPR" by lawfully processing data, collecting data only for specified purposes, keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. All personal data is kept on central IT systems and is not stored or transported on portable electronic devices.

We use your personal data for the following purposes: -

- To enable us to provide benefits to the public and of charities and community groups as specified in our constitution;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services, and to survey your views on matters relevant to the charitable sector;
- To fulfil specific requirements of service delivery contracts with government agencies, local government, other charities and private providers;

4. What is the legal basis for processing your personal data?

Personal data must be Processed lawfully, fairly and in a transparent manner. A data subject consents to us processing their data if they consent clearly either by a statement or a positive action. As part of our charitable activities we aim to keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about events, training and other matters relevant to the charitable sector. Under the contract with our software provider with Donor Perfect, data is shared between the two parties to ensure access to the relevant electronic systems are maintained, but only anonymised data is used for reporting and monitoring. Processing is necessary for carrying out obligations under employment, health and safety,

social security or social protection law, or collective agreements. Such protection and justification for processing applies to personal data relating to volunteers at Milton's Cottage Trust CIO.

Where personal data is collected relating to attendance at a Milton's Cottage Trust CIO event or training, unless specific consent is given, that data will only be used in communications around the administration, running and follow-up for that event under legitimate interest. Where personal data is collected under HMRC's Gift Aid Small Donations Scheme, that data will only be used for matters relating to Gift Aid claims, under legitimate interest. Where personal data is collected relating to calls to Milton's Cottage Trust CIO, personal data is only collected to enable service delivery and for reporting purposes (with the exception of contact information which may be used to call back if messages are left).

Where personal data is collected relating to volunteering, only information required for service delivery or for prioritisation is collected, and all sensitive personal data (whether electronic or hard copy) is securely stored and access restricted only to staff who need it. For reasons of continuity of service delivery, and to ensure that relevant information about repeat clients or volunteers is available, data is retained for longer than the period stated in (6) below.

Only data necessary to direct service delivery is shared with, for example, an employee volunteer group or delivering third party. Any personal data shared with the commissioner is either anonymised, or specific consent is sought to enable this sharing. Where personal data is collected relating to any other short-term project, only data that is needed will be collected, and the other considerations made clear elsewhere in this policy will apply.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will not be shared except where specifically required by contractual agreements. We will only share your data with third parties outside of Milton's Cottage Trust CIO with your explicit consent. Any such cases where partnership working agreements require data sharing, specific consent will be obtained.

6. How long do we keep your personal data?

We keep data in accordance with the GDPR, and our Board of Trustees has decided that in relation to membership data (i.e. consent data), the appropriate duration for data retention should be three years. All personal data relating to accounting records, tax law and Gift Aid will be retained as required by law for 7 years.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Milton's Cottage Trust CIO holds about you;
- The right to request that Milton's Cottage Trust CIO corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Milton's Cottage Trust CIO to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data;
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose not covered by this Data Protection Notice, then we will publish a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Milton's Cottage Trust CIO by writing to Milton's Cottage Trust CIO, 21 Deanway, Chalfont St Giles HP8 4JH or by email to management@miltonscottage.org

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.