# Stanford in the Vale Public Purposes Charity Privacy Policy

#### Introduction

This document is the Public Purposes Charity (PPC) Privacy Policy and demonstrates the Charity's compliance with the General Data Protection Regulation (GDPR) 2018 implemented on 25<sup>th</sup> May 2018.

#### **Personal Data**

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria.

#### The PPC

The PPC has provided this document for your information in its capacity as Data Controller for your data in event that you or your organisation has submitted a grant or allotment application to the PPC.

#### Awareness.

This document and the PPC's IT security policy have been circulated to all Trustees together with guidance on the safeguarding of personal information which comes into the possession of Trustees.

#### Information held.

As the result of an application submitted to the PPC for a grant or an allotment, the following information is held by the PPC:

- · Names; Christian and Family
- Address
- Telephone number
- Email address

# Individuals' rights

Applicants have the right to approach us in respect of the points listed above.

# Rights and personal data

You have the following rights with respect to your personal data:

## 1. The right to access information we hold on you

At any point you can contact us to request the information we hold on you as well as why
we have that information, who has access to the information and where we obtained the
information from. Once we have received your request we will respond within one
month.

• There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

## 2. The right to correct and update the information we hold on you

• If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

#### 3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

#### 4. The right to object to processing of your data

You have the right to request that we stop processing your data. Upon receiving the
request, we will contact you and let you know if we are able to comply or if we have
legitimate grounds to continue to process your data. Even after you exercise your right
to object, we may continue to hold your data to comply with your other rights or to bring
or defend legal claims.

#### 5. The right to data portability

You have the right to request that we transfer some of your data to another controller.
 We will comply with your request, where it is feasible to do so, within one month of receiving your request.

# 6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.

- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- 7. The right to object to the processing of personal data where applicable.
- 8. The right to lodge a complaint with the Information Commissioner's Office.

When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

#### Lawful basis for processing personal data

PPC data is processed because it is necessary for our legitimate interests, or the legitimate interests of the Grant Applicant.

Some of our processing is necessary for compliance with a legal obligation. For example, we are required by Charity Commissioners to demonstrate due process in the consideration of Grant Applications and the accounting practices relating to the Public money we disperse.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in relation to your grant or allotment application.

In the unlikely event that your information is used other than in accordance with one of these legal bases, then we will always seek your consent to that use.

#### Consent

The PPC has included a consent section in its grant application and allotment application forms which enable it to document approval from the applicant for the storage of their personal information.

#### Children

All applications must be submitted by an adult and PPC does not seek or store information from children.

#### **Data breaches**

The PPC IT Security Policy details the Risk Assessment process and mitigation to address identified risks.

#### **Data Protection Officer**

The PPC has appointed The Clerk as its Data Protection Officer to fulfil the responsibilities defined above.