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GDPR PRIVACY POLICY

POLICY STATEMENT

The Trustees of Egham United Charity (EUC), Egham Education Trust (EET) and Stewart’s and Budgen’s Almshouses (S&B) are committed to protecting and respecting the privacy and rights of all our data subjects; the people whose personal data We collect and use. We value the personal information entrusted to us and We respect that trust, by complying with all relevant laws and adopting good practice.

This policy sets out the basis on which any personal data will be processed by us, what We collect and why, what We do with the information, what We won’t do with the information and what rights our data subjects have. It also applies to the website We operate, our use of emails, paper-based communications and any other methods We use for collecting information.

Under the General Data Protection Regulation (GDPR), the data controller is The Trustees of EUC, EET, and S&B, c/o Gladstone House, 77 – 79 High Street, Egham, Surrey TW20 9HY.

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1. The personal data We process

The definition of personal data under the GDPR is “any information relating to an identifiable person who can be directly or indirectly identified”. This applies to data within both manual filing systems and data that is collected and processed electronically. Personal data items are therefore diverse and include names, email addresses, ID numbers, location data, online identifiers, employment details, photographs, voicemails, etc.

a. **Personal data We collect**

Information given to us by data subjects

Data subjects may give us information about themselves by filling in our website 'contact form', downloading and submitting grant application forms from our site (www.eghamunitedcharity.org) or by corresponding with us by phone, e-mail or otherwise. The information given to us may include a name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.

Information We collect automatically

The Charity website exists only to give information. It does not collect any information automatically about visitors to the site other than that submitted by visitors via the contact/ enquiry form.

Information We receive from other sources

We collect no other information direct from the website. Information is only obtained from completed application forms and from referral agencies by phone, e-mail or otherwise.

b. **Special category data**

Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. Sensitive personal data is data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership/activities, mental or physical health, sexual orientation, genetic and biometric data. Information on criminal activity is also considered ‘special category’ data.

In the event that We process sensitive personal data, We will meet the appropriate extra conditions for processing, as detailed in section 2.

c. **Children’s data**

Some of the services We offer are aimed specifically at children (for example Applications for Duke of Edinburgh Award financial assistance) and to deliver these services safely it is necessary for us to collect data and store it. Before We collect data from anyone under 18 We will always ask them to obtain the permission of a parent or guardian before registering with us.

d. **Categories of data subjects**

Our data subjects typically fall under one of the following categories:

- Trustees and Officers
- Donors
- Service users
- Service contractors
- Volunteers
- Website visitors
- Visitors in person

2. Our lawful basis for processing personal data

Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the GDPR, is met:

- the processing is **necessary for a contract** with the data subject;
- the processing is **necessary for us to comply with a legal obligation**;
- the processing is necessary to protect someone’s life (this is called “**vital interests**”);
- the processing is necessary for us to perform a task in the **public interest**, and the task has a clear basis in law;
- the processing is **necessary for legitimate interests** pursued by our charity or another organisation, unless these are overridden by the interests, rights and freedoms of the data subject.

- If none of the other legal conditions apply, the processing will only be lawful if the data subject has given their clear **consent**.

Processing of 'special categories' of personal data is only lawful when, in addition to the conditions above, one of the extra conditions, as listed in Article 9 of the GDPR, is met. These conditions include where:

- the processing is necessary for carrying out our obligations under **employment and social security and social protection legislation**;
- the processing is necessary for **safeguarding the vital interests** (in emergency, life or death situations) **of an individual** and the data subject is incapable of giving consent;
- the processing is carried out **in the course of our legitimate activities** and only relates to our members or persons We are in regular contact with in connection with our purposes;
- the processing is necessary for **pursuing legal claims**;
- If none of the other legal conditions apply, the processing will only be lawful if the data subject has given their **explicit consent**.

3. Our intended purposes for processing personal data

We use information held about our data subjects in the following ways:

Information given to us by data subjects

We will use this information to:

- fulfil requests – such as provide grants or equipment
- process donations, or other payments and verify financial transactions;
- identify visitors and contributors;
- record any contact We have with people;
- carry out research on the demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them and to enable us to improve our service;
- communicate with our supporters, service users, and service contractors;

Information We collect automatically

The Charity website exists only to give information. It does not collect any information automatically about visitors to the site other than that submitted by visitors via the contact/ enquiry form.

Information We receive from other sources

We may use the information given to us for the purposes set out above (depending on the types of information We receive).

4. Who We share personal data with

We may share your personal information with Trustees and Officers of EUC, EET and S&B.

We may share your information with selected third parties if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court;
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises;
- We are working with a carefully selected partner that is carrying out work on our behalf;

We may disclose your personal information to third parties:

- if EUC, EET AND S&B or substantially all of its assets are acquired by a third party, in which case personal data held by it about its data subjects will be one of the transferred assets;
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of EUC, EET and S&B data subjects, or others.

We never sell or share your information to other organisations to use for their own purposes.

5. How We protect personal data

We will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.

We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing.

Measures will include technical and organisational security measures. In assessing what measures are the most appropriate We will take into account the following, and anything else that is relevant:

- the quality of the security measure;
- the costs of implementation;
- the nature, scope, context and purpose of processing;
- the risk (of varying likelihood and severity) to the rights and freedoms of data subjects;
- the risk which could result from a data breach.

Measures may include:

- technical systems security;
- measures to restrict or minimise access to data;
- measures to ensure our systems and data remain available, or can be easily restored in the case of an incident;
- physical security of information and of our premises;
- organisational measures, including policies, procedures, training and audits;
- regular testing and evaluating of the effectiveness of security measures.

If stored electronically, information is stored by us on computers located in the UK and on reputable cloud-based storage systems. We may transfer the information to other reputable third-party organisations for the purposes of back-up and mobile working. They may be situated inside or outside the European Economic Area.

Where We have given you (or where you have chosen) a password which enables you to access certain parts of our database, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, 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 to our site; 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.

We may also store information in non-electronic forms, for which We have security procedures in place to protect it in line with the GDPR.

Our **Information Security Policy** contains further details on the measures We have in place to protect personal data and prevent a data breach.

6. How We erase data upon expiry of retention period

We will not keep personal data longer than necessary for the purposes for which it was collected. We will comply with official guidance issued to our sector on retention periods for specific records. Further information can be found in our Data Retention Schedule.

Personal data stored electronically will be fully erased from file and back-up.

Documentation containing personal data stored or archived in physical files will be shredded upon expiry of the retention period.

7. Data subject rights

The General Data Protection Regulation (GDPR) brings new legal rights for individuals whose personal data is processed; We will process personal data in line with these rights to:

- **be informed** that their personal information is being collected – at the point of collection - and the purposes for which it is being processed, retention periods and who it will be shared with;
- **access** personal data held and processed by us;
- **rectification** of any personal data that is inaccurate or incomplete;
- **erasure**, or to ‘be forgotten’ if their data is no longer necessary for the purpose for which it was collected and *Consent* is the lawful basis for processing;
- request that processing is **restricted** although We may still store their personal data; this is an alternative to requesting erasure of their data and the restriction is likely to be for a fixed period;

- data portability, which means to receive their data, or some of their data, in a format that can be easily used by another person (including the data subject themselves) or organisation;
- object to processing in certain circumstances, including preventing the use of their data for direct marketing.

If We receive any request from a data subject that relates or could relate to their data protection rights, this will be forwarded to The Secretary to the Trustees, **immediately**, who will follow the Subject Access Request procedures accordingly. We will act on all valid requests as soon as possible, and at the latest within **one calendar month**, unless We have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

Any information provided to data subjects will be concise and transparent, using clear and plain language.

8. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to The Secretary, Egham United Charity, c/o Gladstone House, 77 – 79 High Street, Egham, Surrey TW20 9HY.