

Privacy Notice - The Wixamtree Trust

The Wixamtree Trust (**we, us or the Trust**) is a charity registered under charity number 210089; its registered office is 6 Trull Farm Buildings, Trull, Tetbury, Gloucestershire, GL8 8SQ.

We are the owners of the website at <https://www.wixamtree.org> (our **site**).

1 What is the purpose of this document?

- 1.1 We are committed to protecting and respecting your privacy. This privacy notice sets out the basis on which we collect any personal information from individuals who engage with us, and how this information will be processed by us.
- 1.2 This privacy notice applies to donors, supporters and beneficiaries of the Trust; applicants for and recipients of grant funding; visitors to our site who do not register as well as those who do; and all individual contractors and service providers who provide services to the Trust ("**you**").
- 1.3 We are a **data controller**. This means that we are responsible for deciding how we hold and use personal information about you, and for explaining this clearly to you.
- 1.4 Please read this notice carefully to understand what we do with your personal information and what rights you have in relation to our activities. This notice will be reviewed periodically. Any changes will be posted on this page and will become effective on that date. We encourage you to review this page for significant changes from time to time.

2 What is personal information and our lawful basis for processing it?

- 2.1 Personal information means any information relating to an individual from which that person can be identified. There are special categories of more sensitive personal information (known as special category personal information) which require a higher level of protection.
- 2.2 We will only use your personal information when the law allows us to. Our principle lawful basis for processing is set out in the table below. However, some of our grounds for processing will overlap and there may be several grounds which justify our use of your personal information.
- 2.3 We may only rely on our legitimate interests (or those of a third party) to process your personal information, if your interests and fundamental rights do not override those interests. Where we rely on legitimate interests for our processing, we have set out the relevant interest in the table below.
- 2.4 We will only use your personal information for the purposes for which we initially collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 2.5 Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

3 Information we collect from you and about you and how our use complies with the law

Information we collect from you		
Information	How we use your information	How our use complies with the law
For grant applications made by organisations, we collect the name, job title and business contact information of your individual employees and other representatives (and references to 'you' in this notice is to the individual employee or representative).	To enable us to contact you and assess the grant application.	For the legitimate interest of assessing the grant application, managing the Trust and applying our funds in accordance with our charitable purposes.
For individual donors and supporters of the Trust we collect your name and contact details, and information relating to your past donations and fundraising activities	To enable us to contact you about your support for the Trust and (with your consent) to send marketing information about further fundraising activities.	This processing is necessary for our legitimate interest of raising funds to support the Trust.
For corporate donors and supporters of the Trust we collect the name, job title and business contact information of your individual employees and other representatives (and references to 'you' in this notice is to the individual employee or representative).	To enable us to contact you about your support for the Trust and (with your consent where applicable) to send marketing information about further fundraising activities.	This processing is necessary for our legitimate interest of raising funds to support the Trust.
The content of any messages you send us.	To enable us to respond to your queries.	This processing is necessary for our legitimate interest of managing the Trust and improving our services.
Feedback you provide to us on our services.	To review and improve our services.	This processing is necessary for the legitimate interest of managing the Trust and improving our services.
For corporate contacts and suppliers of services to our business, we collect the name, job title and business contact	To receive your services.	This processing is necessary to enter and to perform the contract between us and our

information of your individual employees and other representatives.		supplier.
Information we collect about you		
Your profile: we may take information collected from you and combine it with information collected from third parties.	We do this to better inform our relationship with you and to ensure we contact you in the most appropriate manner.	This processing is necessary for the legitimate interest of informing and improving our relationship with you.
Background information relating to our past dealings with you.	To inform and improve our service.	This processing is necessary for the legitimate interest of informing and improving the service we provide to you.
Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform via cookies on our website.	To allow you to navigate around the website.	This processing is necessary for our legitimate interests to ensure the smooth running of our website. You can disable cookies on your browser.

4 **Special Category Data**

We do not process particularly sensitive personal information as part of our usual course of business. However, we may process such information where it is necessary for us to comply with a legal obligation.

5 **Sharing your information**

- 5.1 Your information will not be shared with third parties outside the Trust, used for marketing purposes, or used in any other way, except as set out in this notice or where required by law.
- 5.2 If you are an applicant for grant funding, your application will be shared with our Trustees to enable them to assess your application.
- 5.3 We may share information with third parties to the extent necessary to permit good governance of the Trust, as follows:
- 5.3.1 with our professional advisors and auditors;
 - 5.3.2 with the Charity Commission;
 - 5.3.3 with HMRC or other government or law enforcement agencies; or

5.3.4 if we have a legal obligation to do so..

5.4 If you object to our sharing or continuing to use your personal information with any specific third party please contact us at the Trust and Foundation Manager at 6 Trull Farm Buildings, Trull, Tetbury, Gloucestershire GL8 8SQ.

5.5 We share your data with third-party service providers, such as IT support and maintenance service, website host server, cloud storage provider and email exchange server and other businesses that provide certain services on our behalf. All of our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes.

6 **If you fail to provide personal information**

6.1 You are required to provide the personal information set out in sections 1 of the table. Without this we will not be able to provide our services to you.

6.2 We want to be sure that the personal information we hold about you is accurate and current. Please contact the Trust and Foundation Manager at the above address to update your details.

7 **Automated decision-making**

7.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

7.2 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

8 **Data security**

8.1 We have put in place:

- (a) appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed; and
- (b) procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9 **How long will we keep your personal information for?**

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

9.2 Where a minimum retention period is required by law (such as retaining records for HMRC purposes) we comply with that minimum period plus up to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes.

10 **Your rights**

10.1 You have the following rights:

- 10.1.1 to be told what we are doing with your personal information. We do this by providing you with this notice;
- 10.1.2 to correct or update the personal information we hold about you;
- 10.1.3 to object to the processing of your personal information;
- 10.1.4 to request a copy of the personal information we hold about you;
- 10.1.5 to ask us to delete the information that we hold about you where there is no good reason for us continuing to process it;
- 10.1.6 to ask us to stop processing your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
- 10.1.7 to ask us to restrict how we use your personal information for a period of time if you claim that it is inaccurate and we want to verify the position or in some limited other circumstances;
- 10.1.8 to ask us to send your personal information to another organisation in a computer-readable format;
- 10.1.9 to complain to the Information Commissioner's Office if you are unhappy with our use of your personal information: you can do this at <https://ico.org.uk/concerns/> Do contact us straight away if you consider that we are not handling your personal information properly so we can try and sort the problem out.
- 10.2 If we delete your personal information or restrict our use of it, we will not be able to provide our services to you.
- 10.3 If you want to exercise any of your rights, please contact the Trust and Foundation Manager at the address set out at 5.4 above. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).