

## COMMUNITY FOUNDATION FOR CALDERDALE PRIVACY NOTICE

Please read this Privacy Notice. It relates to how the Community Foundation for Calderdale (“we” / “our”) hold and process your personal data (“information”) and your rights in relation to the data.

When we refer to information in this privacy notice we are specifically referring to personal data as defined and set out in the UK General Data Protection Regulation and Data Protection Act 2018 (“Legislation”).

We are a registered charity (registration number 1002722) and a limited company with company registration number 2599428. Our registered office address is at The 1855 Building (First Floor), Discovery Road, Halifax, West Yorkshire, HX1 2NG.

We are registered with the Information Commissioner’s Office (ICO) with registration number 00012690000.

The person responsible for data protection at the Community Foundation for Calderdale is Steve Duncan (“Data Compliance Manager”) who can be contacted by email at [steve@cffc.co.uk](mailto:steve@cffc.co.uk) or in writing to our registered office address above.

Our website is [www.cffc.co.uk](http://www.cffc.co.uk) (“website”)

We are a "data controller". This means that we are responsible for deciding how we hold and use your information. We are required under the data protection legislation to notify you of the details contained in this privacy notice. We have a duty to keep your information secure and we will do so.

The information we hold and process, for what purpose, and for how long depends upon what the information we have is and who it relates to as follows:

### **1.Information relating to donors, supporters and volunteers**

We collect and administer this information usually from the individuals themselves directly. However, we also collect information from other sources, including where existing supporters feel someone may be interested in supporting its work and suggest names to us; information collected via a service provider like LocalGiving or JustGiving information from publicly available sources including information gathered from a news article or on-line media. We may also use publicly available directories and similar information such as the Royal Mail’s National Change of Address database and Companies’ House.

#### **(i)Lawful basis for doing so**

This information is collected and processed as it is necessary in our legitimate interests as a charitable organisation to do so.

#### **(ii)What the information comprises**

The information of these individuals that we may hold and process is:

- Name(s) and address(es), email address(es), telephone number and other relevant contact details
- Relevant family or friend’s information including information on successor advisors;

- Occupation, skills and professional activity and network(s);
- Financial information and interest in philanthropy;
- Information relating to links and connections with and in Calderdale;
- Records of donations including assets used to make donations, Gift Aid status etc;
- Records of volunteering for the Community Foundation;
- Information about our relationship with the individual, correspondence, meeting notes, attendance at events etc;
- Information necessary to manage funds an individual has established or supported including information on successor advisors; and
- Information on membership of the Community Foundation, where applicable.

Not all of the above information may be personal data under the Legislation but we have included the same in this document as good practice and for transparency.

### (iii)The purpose we process the information

The information is used by us for the following purposes:

- to build financial and volunteer support for the Community Foundation for Calderdale through various fundraising and marketing activities;
- to send communications about us and our activities;
- administering donations (including but not limited to funds which are subject to donor and funding agreements);
- administering volunteering opportunities and programmes where we match volunteers with community needs;
- administering membership; and
- promoting the aims and objectives of the Community Foundation for Calderdale through other activities.

In addition, we may use information obtained to ensure that contact details are up to date, to plan fundraising (including using indicators of affluence so as to reflect the possible level of donation someone is able to make) and to ensure that appropriate due diligence is carried out to safeguard our assets and reputation.

### (iv)How long we hold the information

This information is held by us indefinitely but is regularly reviewed for relevance and accuracy. Any data that has become irrelevant or inaccurate is either deleted or updated.

## **2.Information relating to our members**

We operate a form of membership where individuals, businesses and /or charities pay an annual fee for membership.

### (i)Lawful basis for doing so

This information is collected and processed as it is necessary in our legitimate interests as an organisation to do so.

### (ii)What the information comprises

The information comprises the member's name(s), their business (if relevant), email address(es) and telephone numbers.

(iii)The purpose we process the information

This is for the purpose of membership and administering membership, and includes building financial and volunteer support for the Community Foundation for Calderdale through various fundraising and marketing activities and sending communications about us and our activities.

(iv)How long we hold the information

This information is held by us indefinitely (and is retained after someone or a business ceases to be a member) but is regularly reviewed for relevance and accuracy. Any data that has become irrelevant or inaccurate is either deleted or updated.

**3.Information relating to grantees or loanees**

Grantees refers to individuals, businesses, or not for profit organisations who apply to us for a grant, loan, or subsidy and whether or not their application is successful.

(i)Lawful basis for doing so

This information is collected and processed as it is necessary in our legitimate interests as an organisation to do so. It is also necessary in the legitimate interests of the grant or loan applicant. Applicants are advised of this fact in the application process and referred to the Privacy Notice.

In addition, the recipient is asked if they will consent to receiving further details of our charitable activities in future. The consent required is specific and is retained on this lawful basis once given. The individual is advised at the time of providing their consent that they can withdraw the same at any time and the process for doing so. Similarly, when notifications are sent they are also advised that their consent to receive future mailings can be withdrawn.

(ii)What the information comprises

The information comprises:

- Name(s) and address(es), email address(es), telephone number and other relevant contact details and preferences;
- Purpose and details about an application for a grant;
- Any other information needed for the assessment of a grant which may include financial, family, education and employment information;
- Details about any grant or loan that is made; and
- Information about our relationship with the applicant, correspondence, meeting notes, attendance at events etc.

Not all of the above information may be personal data under the Legislation but we have included the same in this document as good practice and for transparency.

Where the recipient confirms the specific consent to receive further details of our work in the future, the information we retain is limited to a contact name and email address to receive such notifications.

(iii)The purpose we process the information

The information is obtained and is used to solicit and process applications for grants. Some of the information may also be processed in the ways described above under “Information relating to donors, supporters and volunteers” since many grantees also volunteer for the Community Foundation or support its work in some way.

(iv)How long we hold the information

Once a grant has been expended or a loan has been repaid, the recipient is asked to complete an Evaluation Form. Once received, we retain the recipient details (Name, Grant Information including financial information) in line with the requirements of our Funders for a period of five years. Any personal data is deleted 6 weeks after receipt of the Evaluation form if that data is not required by the Funder. Personal data of a recipient of direct Foundation funding is also deleted 6 weeks after receipt of the completed Evaluation Form. The Evaluation Form is retained indefinitely for reference and research purposes. The Evaluation Form does not contain any personal data.

If the recipient consents to receive future details of our activities, and consent is subsequently withdrawn, the details are deleted within two weeks.

**3.Information relating to our trustees**

We are run by a board of trustees. The trustees are appointed and retire (or are reinstated) at our annual general meeting.

(i)Lawful basis for doing so

This information is collected and processed as it is necessary in our legitimate interests as an organisation to do so and is in line with our constitution.

(ii)What the information comprises

The information about each of our trustees that we hold and processes comprises:

- Name and address, email, telephone number and other relevant contact details and preferences; and
- C.V. or biography.

(iii)The purpose we process the information

We hold this information for a number of reasons, but specifically for other trustees to vet and approve (or not approve) a potential trustees suitability for the role, and thereafter for contact purposes in their role.

(iv)How long we hold the information

This information is held for so long as the trustee remains in office. Once they cease to become a trustee (for any reason) the information is deleted save for their contact details and C.V or biography for future reference.

We also retain the consent forms and confirmation of deletion of data form (see “information that trustees may process” below). All other data is deleted within six weeks.

#### **4.Information that trustees may process**

Once in a role of trustee, trustees are given access to some information held by us to enable them to fulfil one of their many roles on our behalf.

All trustees sign a confirmation to acknowledge that such access to information, and general information which they receive as a result of their role, is confidential. We have adopted the use of Basecamp project management software which facilitates confidential online collaboration between the trustees. The information on Basecamp is automatically archived by the software after a short period of time.

When a trustee retires they also sign to confirm that any such data they hold has been destroyed and deleted. If they fail to do so, then we may, if we deem necessary, apply to the court for an order that they do so.

#### **5.Information relating to visitors to the Website**

We obtain and retain data of those who visit our website even if they do not interact in any other way. The cookies on the website retain information about the identifier of the website users and such other computer data. This is retained as it is necessary in our legitimate interests and also of the visitor as it enhances a visitors' experience when visiting the website. Details of the use of cookies on the Website can be found in the Cookie policy.

#### **6.Information relating to Suppliers**

We hold and process information about our suppliers.

##### **(i)Lawful basis for doing so**

It is necessary for us to process the information obtained for the purpose of a contract (or in anticipation of a contract being entered into) with a supplier.

##### **(ii)What the information comprises**

This includes the company or organisation name, contact name(s), email address(es), postal address(es), telephone numbers, bank details, and details of quotations received and orders placed and settled.

Not all of the above information may be personal data under the Legislation but we have included the same in this document as good practice and for transparency.

##### **(iii)The purpose we process the information**

The purpose we process it is to instruct / order goods and services, and for payment.

##### **(iv)How long we hold the information**

Once a contract has been fulfilled with a supplier, we will retain the information as we consider it necessary to do so in our legitimate interests and also in the legitimate interests of the supplier in order to assist in future business relationships with them and facilitate those relationships. This information is retained indefinitely for this reason.

## **7. General other information**

We hold information of other companies, businesses, organisations or associations with whom we have a professional relationship or potentially common interest.

### **(i) Lawful basis for doing so**

We do this as we consider it necessary in our legitimate interests to enhance and preserve such relationships.

### **(ii) What the information comprises**

For these third parties, we process business / organisation names, contact names, addresses, email addresses, and telephone numbers.

Not all of the above information may be personal data under the Legislation but we have included the same in this document as good practice and for transparency.

### **(iii) The purpose we process the information**

We hold and process the information to facilitate, nurture and develop these relationships.

### **(iv) How long we hold the information**

We hold this information indefinitely and for so long as it remains relevant to us.

## **Data sharing**

Our computer and IT systems are maintained and hosted by Brighthouse Computers. We have written terms in place which facilitate the sharing of information with them as our data processors.

We may also share information with our legal advisers and financial auditors where it is necessary to do so.

Your information will not otherwise be shared with any other third party without your consent. Your data is not held outside the United Kingdom.

## **Automated processing**

We do not process information by automated means nor do we use profiling.

## **Your rights**

- (i) You have the right to request copies of any information that we hold relating to you.
- (ii) We are obliged to ensure that all information that we hold about you is up to date and correct. If you believe this not to be the case, you should let us know.
- (iii) You can ask that information that we hold about you is erased or deleted.
- (iv) You may ask that we restrict processing all, or some, of your information.
- (v) You can object to us processing your information used for marketing purposes.

### **How to exercise your rights**

If you would like to exercise any of your rights, please email [steve@cffc.co.uk](mailto:steve@cffc.co.uk) or write to us at the registered address given at the top of this notice. We will then consider your request and action the same as necessary although in some circumstances we may have a legitimate reason for not being able to action your request. If this should be the case then we will notify you of the reason why.

### **If you have cause for complaint**

If you have any cause for complaint, or do not believe that we are processing your information fairly or in line with our obligations as a data controller, then we would ask that you contact us in the first instance with your concerns although you are not obliged to do so and you may contact the Information Commissioner's Office whose details can be found at [www.ico.org.uk](http://www.ico.org.uk)

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