

Barnwood Trust

Privacy Notice

1. What is this?

Barnwood Trust (the “**Trust**”, “**we**”, “**us**” or “**our**”) is committed to protecting and respecting your privacy and personal data. Collecting and holding your personal data is a serious responsibility, and we want you to know that we are handling it properly and lawfully.

This notice (together with our terms of use and any other documents referred to on it) sets how we collect personal data about individuals, how this data is used, the conditions under which it may be disclosed to others and how it is kept secure.

This privacy notice is to be referred to when any personal data is collected by the Trust relating to individuals externally (i.e., non-employees). For example, any personal data collected through our website or social media channels and data captured at events or during research projects.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

2. Who are we?

Barnwood Trust (charity number: 1162855 and registered address Overton House, Overton Road, Cheltenham, GL50 3BN, United Kingdom) is the ‘controller’ of your personal data in relation to the processing activities described below. A ‘controller’ is an organisation that decides how and why your personal data is processed.

We have appointed a Data Protection Lead who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about

this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Lead using the details at the end of this notice.

3. The data we collect about you.

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about services, support and/or grants you may receive from us.
- **Research Data** includes audio, video files, and written files, including (but not limited to) interview recordings, survey data, and evaluation forms. This may include details of whether the individual is a carer or has lived experience of a disability or mental health condition. For equal opportunities monitoring, we may also ask you to provide optional special category data that match the 'protected characteristics' within the Equalities Act 2010. This may include disability, age bracket, gender, sexual orientation, ethnicity, and religion or belief.
- **Grant Application Data** includes details of individuals and their specific requirements to support grant applications.
- **Barnwood Circle Membership Data** includes first name, last name, pronouns, telephone number, email address, postal address, date of birth, marketing and communications preferences, access requirements, details of whether the individual is a carer or have lived experience of a disability or mental health condition. For equal opportunities monitoring, we may also ask you to provide optional special category data that match the 'protected characteristics' within

the Equalities Act 2010. This may include disability, age bracket, gender, sexual orientation, ethnicity, and religion or belief.

- **Correspondence Data** includes information provided when contacting us in relation to our activities or projects, when making an enquiry via our website about our organisation, or if engaging in correspondence within us by phone, email, or otherwise. We may also ask you for information when you report a problem with our website.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.
- **Survey Data** include any information you provide if you complete any surveys that we request you to complete for research purposes.
- **Legal Data** relating to claims made by you or against you.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data as it will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect special category data where it is proportionate and necessary to do so or where it is provided voluntarily, including information in relation to your health or any conditions you have to enable us to consider any adjustment requirements in respect of our activities, research, projects, and network, or to assess a grant application where such information has been voluntarily provided.

4. How is your data collected?

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by our website, social media platforms, post, phone, SMS, email or otherwise. This includes personal data you provide when you:
 - join our mailing list;
 - apply for or attend an event;
 - apply to become a Barnwood Circle member;
 - completing a research consent form; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data (see paragraph 3 above) about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We may obtain certain personal data about you from sources outside of our organisation which may include local authorities, our funded partners, or other voluntary sector and community organisations. We may also obtain personal data about you when we are working on grant or tender opportunities. We may have obtained your personal data from a third-party company as a result of an asset transfer or reorganisation. The personal data we receive from third party sources is described within paragraph 3 above.

5. How do we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Legitimate interests as a business or that of a third party** for the following purposes:

- for analysis to inform our progress against our objectives and marketing strategy;
- to help us understand how our website is used and by whom, to research visitor demographics, interests, and behaviour, and to assist, enhance and personalise visitor experience (including to make improvements to our services and website);
- for marketing activities to generate support and engagement (other than where we rely on your consent to contact you);
- to correspond or communicate with you and assist with your grant application(s), or to support you through a funded partnership;
- to verify the accuracy of data that we hold about you and create a better understanding of you;
- to monitor access requirements and communication preferences for the purposes of supporting Barnwood Circle members involved in the scheme;
- to assess and improve our engagement with you and to provide staff training within the organisation;
- for administration purposes, including statistical analysis;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft, or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights under data protection laws (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the management of enquiries, queries, complaints, or claims;
- for prevention of fraud and other criminal activities; and
- for the establishment and defence of our legal rights.

- **Performance of a contract** with you or to take steps to enter into it. We may use and process your personal data where we have a contract with you and need to process such data to comply with obligations under the contract or so that you can comply with specific counter-obligations under the contract.
- **Compliance with a legal obligation.** We will use your personal data to comply with our legal obligations:
 - to assist any regulatory authority or criminal investigation body, including the Charity Commission and HMRC;
 - to identify you when you contact us; and/or
 - to verify the accuracy of data we hold about you.
- **Vital interests.** We may use your personal data to contact you if there are any urgent health and safety notices to communicate to you or where we otherwise reasonably believe that the processing of your personal data will prevent or reduce any potential harm to you. It is in your vital interests for us to use your personal data in this way.
- **Consent.** We may use and process your personal data where you have consented for us to do so for the following purposes:
 - to send you direct marketing communications. Please see the section on Marketing below for more information, including how to withdraw your consent;
 - to contact you about opportunities to participate in research or evaluation activities, and to collect and analyse the data gathered through such research and/or evaluation activities. Further information can be found in the Trust's Research Code of Practice, a copy of which can be requested using the details at the end of this notice; and
 - to make adjustments for anyone with a disability who engages with our organisation and to eliminate any barriers to accessing our grants and opportunities in accordance with our legal obligations. Our processing of special category data, such as health information you give us, will require your consent. Where

we rely on your consent to process special category data, you have the right to withdraw your consent at any time.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

6. Disclosures of your personal data

When disclosing your personal data to third parties, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

We may disclose your information to the following third parties:

- **Our suppliers and service providers.** We may disclose your information to our third-party service providers, advisors, agents, subcontractors, and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include our cloud service providers (such as hosting and email management), IT providers, professional advisors (including accountants and lawyers), advertising and marketing agencies, research contractors (including transcribers), communication fulfilment service providers, network or telecommunications service providers, external subcontractors such as technicians and engineers, and administrative service providers. The key third parties that we engage as service providers include Sage, Flexi-Grant, IRIS HR, and Iris Earnie. When we use third party service providers, we only disclose to them any personal data that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
- **Credit/debit card payment processors.** When you make a payment online, your credit/debit card payment is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions

regarding secure transactions, please contact us using the details at the end of this notice.

- **Surveys.** We may ask a third-party research company to contact you for the sole purpose of gathering general information and specific information relating to us and our services.
- **Asset transfer or restructure.** We may transfer your personal data to a third party as part of a transfer of our assets to any third party or as part of any restructuring or reorganisation. It also includes in the event of any liquidation, dissolution, or administration.
- **Legal obligation.** We may also transfer your personal data if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and employees.
- **Other named charities, funders, or partners.** As part of our collaboration with Gloucestershire Funders, we receive applications on behalf of other funders and charities within the Gloucestershire Funders group, and we share such applications with them for discussion at regular Gloucestershire Funders meetings. We will only disclose applications to members of this group. Full details of membership may be viewed here: www.glosfunders.org.uk/about/background/.

7. Where we store your data.

The personal data you provide to us may be transferred to countries outside of the United Kingdom and/or the European Economic Area ("EEA"). This includes the United States, Canada, and India where some of our third-party service providers are located or use sub-contractors in these locations. These countries may not have adequate data protection laws equivalent to those in the UK / EEA.

If we transfer your personal data outside of the UK and/or EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice. These steps include imposing contractual obligations on the recipient of your personal data or ensuring that the recipients are

subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this notice for more information about the protections that we put in place.

8. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, Charity Commission, tax, accounting, or reporting requirements. We do not retain personal data in an identifiable format for longer than is necessary for the purposes for which we collect it unless we believe that the law requires us to preserve it.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

If you have made an enquiry or contacted us (via our website or otherwise), we will store your information for as long as is reasonably required to deal with your enquiry.

If you have contacted us with a complaint, we will store your personal data for as long as is reasonably required to resolve your complaint.

If you have signed up to receive email marketing from us, we will store your personal data for as long as you are subscribed to our email marketing list. If you unsubscribe, we will keep your email address on our suppression list to ensure that we do not send you marketing emails.

When it is no longer necessary to retain your personal data, we will delete the personal data that we hold about you from our systems. After that time, we may aggregate the data (from which you cannot be identified) and retain it for analytical purposes.

The exceptions to the above are where:

- we need your personal data to establish, bring or defend legal claims or to comply with a legal or regulatory requirement;

- the law requires us to hold your personal data for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law, or you exercise your right to require us to retain your personal data for a period longer than our stated retention period (see Appendix); or
- in limited cases, the law permits us to keep your personal data indefinitely provided we put certain protections in place.

For further information regarding our retention periods, please contact us using the details at the end of this notice.

9. Data security and links to other websites

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. 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 information transmitted to our website and any transmission is at your own risk.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable data protection regulator of a breach where we are legally required to do so.

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices or practices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

10. Marketing

We may collect your preferences to receive marketing information about our projects, activities, and events directly from us by email, post, text message, WhatsApp message, or phone in the following ways:

- if you make an enquiry or register for an event and indicate that you would like to receive marketing information from us;
- if you sign up to join our network (Barnwood Circle) via our website, phone, email or other medium where available; or
- when you refresh your marketing preferences when responding to a request from us to do so.

You have the right to opt-out of our use of your personal data to provide marketing to you in any of the ways mentioned above. Please see the Appendix for further details on how you can do this.

11. Cookies

Like many other websites, our website uses cookies to obtain an overall view of visitor habits and visitor volumes to our website). 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [Cookies Policy](#) on our website.

12. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the Appendix to find out more about these rights.

In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal data. Except in rare cases, we will respond to you within one month from either: (i) the date that we have confirmed your identity; or (ii) where we do not need to do this because we already have this information, from the date we received your request.

If you wish to exercise any of these rights set out in the Appendix, please contact us using the details at the end of this notice.

13. Changes to this notice

We may review this notice from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our website, whichever is the earlier. We recommend you regularly check for changes and review this notice whenever you visit our website. If you do not agree with any aspect of the updated notice, you must immediately notify us and cease using our services.

This notice was last updated on 19.03.24

14. Contact us

Questions, comments, and requests regarding this privacy statement are welcomed and should be directed to the Data Protection Lead using the contact details below.

- Data Protection Lead: Alex Bray
- Email address: Alex.Bray@barnwoodtrust.org
- Postal address: Barnwood Trust, Overton House, Overton Road, Cheltenham, GL50 3BN, United Kingdom.
- Telephone number: 0800 422 0404

Appendix

Your legal rights

1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. We may not provide you with a copy of your personal data if this concerns other individuals or we have another lawful reason to withhold that information.
2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by emailing or writing to us.
3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with law. Note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Unless there is a reason that the law allows us to use your personal data for longer, we will make reasonable efforts to comply with your request.

6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format (if this is technically possible). Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. We may not provide you with a copy of your personal data if this concerns other individuals or we have another lawful reason to withhold that information.

7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

8. **Complaining to the data protection regulator.** You have the right to complain to a data protection authority, which in the United Kingdom is the Information Commissioners Office (ICO), if you are concerned about the way we have processed your personal data, however we would welcome the opportunity to deal with any issues or complaints informally

first. Please visit the ICO's website at <https://ico.org.uk/> for further details.