

# St Pancras Welfare Trust

## PRIVACY NOTICE

St Pancras Welfare Trust (UK registered charity number 261261) is committed to protecting your privacy. At all times we aim to respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Notice (**Notice**) explains how we hold and use personal information and your rights in relation to it.

***This Notice contains important information about your personal rights to privacy, so please read it carefully.***

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## 1. **How we collect personal information about you:**

- (a) When you give it to us **directly** (for example, by making a donation or communicating with us by email, phone or letter, or if you apply to become a trustee).
- (b) When we obtain it **indirectly** (for example, your personal information may be shared with us by a social worker or sponsor organisation, or through donation sites such as Virgin Money). To the extent we have not done so already, we will notify you when we receive personal information about you from somebody else, and tell you how and why we intend to use that personal information.

We may combine your personal information from these different sources for the purposes set out in this Notice.

## 2. **What personal information do we use?**

We collect, store and use the following kinds of personal information:

- name and contact details, including postal address, telephone number and email address;
- date of birth and family information;
- financial information, including information regarding financial circumstances (including income, expenditure and details of any financial benefit required), and such as bank and/ or credit/ debit card details, account holder name, sort code and account number;
- information about your computer/ mobile device and your visits to and use of this website, including, for example, your IP address;
- biographical information (for example about your background including your financial needs in the context of an application for a grant);
- any other personal information which you choose to share with us, or which is shared with us indirectly on your behalf via sponsoring organisations, as per section 1.

## 3. **Do we process “special categories” of data?**

Data privacy law recognises certain categories of personal information as sensitive and therefore requiring more protection, for example information about your health or ethnicity.

We collect and/or use these special categories of data when it is provided to us in an application for a grant, where that information is relevant. For example, if the grant is required to assist with accessibility or with health related costs, or otherwise pertinent to the beneficiary's need. We may also collect information about ethnicity in order to analyse our grant-making. We will only process these special categories of data if there is a valid reason for doing so and where the law allows us to do so, such as where it is necessary for reasons of substantial public interest.

## 4. **How and why will we use your personal information?**

Your personal information, however provided to us, will be used for the purposes specified in this Notice, including:

- (a) to keep you or sponsoring organisations informed about our services and our work;
- (b) to recruit trustees and administer trusteeships;
- (c) to consider grant applications;
- (d) to provide you with the information you have requested and to communicate with you in general;
- (e) to provide grants and support to our beneficiaries and to further our charitable aims in general;
- (f) to process donations;
- (g) to manage relationships with our supporters, sponsoring organisations, and beneficiaries;
- (h) to analyse and improve our work/ grant giving, or for our internal records;
- (i) to analyse/ report on the impact and effectiveness of our work;
- (j) to audit and/ or administer our accounts;
- (k) to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/ or law enforcement bodies with whom we may work;
- (l) for the prevention of fraud or misuse of services; and/or
- (m) for the establishment, defence and/ or enforcement of legal claims.

## 5. **Our newsletters**

We may send newsletters to sponsors to inform them about our services and our work more generally. Where we do this via email we will not do without prior consent unless allowed to do so via applicable law. If you do not wish to be contacted about our work and services in the future, please contact us using the details below.

## 6. **Our legal basis for processing your personal information**

The law requires us to rely on one or more lawful bases to collect and use your personal information. We consider the grounds listed below to be relevant:

- (a) Where you have given your **consent** (for example, we may ask for your explicit consent to collect special categories of your personal information).
- (b) Where necessary so that we can comply with a **legal obligation** to which we are subject (for example to share information with HMRC to process Gift Aid).
- (c) Where necessary for the **performance of a contract** to which you are a party or to take steps at your request prior to **entering a contract**.
- (d) Where there is a **legitimate interest** in us doing so. The law allows us to collect and process your personal information if it is reasonably necessary to achieve our or others'

legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

In general, our “legitimate interests” include running the Trust as a charitable entity and pursuing our aims and ideals; for example providing grants, to help those in need or sickness residing within the old Metropolitan Borough of St Pancras within the London Borough of Camden. This includes fundraising to achieve these aims, and sending newsletters about our work and services.

## **7. Children’s personal information**

We do not generally process children’s personal information, but we do ask for the number and age of children in a household in order to determine need (as it relates to an applicant’s dependents). We will always have in place appropriate safeguards to ensure that children’s personal information is handled with due care.

## **8. How long do we keep your personal information?**

In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records:

- where it was provided in support of a grant application, for 12-18 months following submission of the application;
- seven years after the date it was collected in other cases (e.g. if you made a donation).

However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure (please see section 10 below), we will remove it from our records at the relevant time.

## **9. Will we share your personal information?**

We do not share, sell or rent your personal information to third parties for marketing purposes. However, in general we may disclose your personal information to third parties in order to achieve the purposes set out in this Notice. Non-exhaustively, those parties may include:

- (a) other organisations that may be better placed to help those in need – for example, if your grant application falls outside of our geographical area of benefit, we may direct you to another charitable organisation or trust that may be able to assist or pass your details on to them if we have your permission to do so;
- (b) suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts;
- (c) sponsoring organisations, and social workers, that sponsor grant applications;
- (d) insurers;
- (e) financial companies that collect or process donations on our behalf;
- (f) professional service providers such as accountants and lawyers;

- (g) external fundraising entities/ platforms (such as Virgin Money); and/ or
- (h) regulatory authorities, such as HMRC.

In particular, we reserve the right to disclose your personal information to third parties:

- if we are under any legal or regulatory duty to do so; and/or
- to protect the rights, property or safety of the Trust, its personnel, users or others.

## 10. **Security of and access to your personal information**

We take appropriate and proportionate measures to safeguard your personal information and to prevent the loss, destruction, misuse or alteration of it.

Your personal information is only accessible by our Trustee board (and individuals' names are removed from grant applications by our Secretary before they are considered by the wider board), and stored on secure servers.

In general your personal information is held within the UK or European Economic Area (**EEA**). We may use agencies/ suppliers to process personal data on our behalf – if personal information is held by or sent to them outside of the EEA we will take all steps reasonably necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses approved by the European Commission) to protect your personal information.

## 11. **Your legal rights**

Where we rely on your consent to use your personal information, you may **withdraw your consent at any time**. You also have the following rights:

- (a) **Right of access** – you can write to us to ask for confirmation of what personal information we hold about you and request a copy of that personal information. Provided we have confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
- (b) **Right of erasure** – in some cases you can ask us to delete your personal information from our records (or to anonymise it).
- (c) **Right of rectification** – if you believe our records concerning you are inaccurate, you may ask us to update them. You can ask us to check the personal information we hold about you if you are unsure.
- (d) **Right to restrict processing** – you may ask us to restrict the processing of your personal information if there is disagreement about its accuracy or legitimate usage.
- (e) **Right to object** – you have the right to object to processing where we are (i) relying on the basis of legitimate interests, (ii) using your personal information for direct marketing or (iii) using your personal information for statistical purposes.
- (f) **Right to data portability** – where we are processing your personal information (i) on the basis of your consent, (ii) because the processing is necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract, and the

processing is carried out by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information you request to you.

Some of these rights only apply in limited circumstances. In particular, the Trust does not undertake any automated decision making. For more information, or to exercise your rights, please contact us using the details below.

#### 12. **Links and third parties**

Our website links directly to other websites. This Notice **does not** cover those external websites and **we are not responsible** for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via the links on our website.

#### 13. **Changes to this Notice**

We may update this Notice from time to time. We recommend you check it regularly, but we may also notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing a notice on our website.

This Notice was last updated on 11 May 2018.

#### 14. **How to contact us (including complaints)**

If you have any questions or concerns about this Notice or about the way in which your personal information is being used please let us know by contacting us in the following ways:

by email: [spwtrust@gmail.com](mailto:spwtrust@gmail.com)

by post: St Pancras Welfare Trust, PO Box 51764, London NW1 1EA

You are entitled to make a complaint at any time to the Information Commissioner's Office, the UK regulatory authority for data privacy – [www.ico.org.uk/global/contact-us](http://www.ico.org.uk/global/contact-us).