

PRIVACY NOTICE

Who we are

Castle Cavendish Foundation is a registered charity (1119003) and a Company Limited by Guarantee in England (4209702) and our registered address is Castle Cavendish Works, Dorking Road, Nottingham NG7 6PN.

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

Why we collect your personal data and our legal basis for doing so

The law on data protection allows us to process your data for certain reasons only. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Performance of a contract – so that we can administer grant programmes we collect your name and contact details.

Compliance with a legal obligation – so that we can establish and maintain effective governance we collect personal information about Trustees and Members to comply with Company and Charity law and regulations.

Legitimate interests – so that we can carry out our charitable activities effectively, we keep in regular contact with you by email and/or telephone so that you are have the up-

to-date information about our grant programmes, our services, local events or training, local news, other funding opportunities.

Less commonly we may also use personal information about you where you have given us consent to use it in a certain way, or we need to protect your vital interests (or someone else's interests).

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

Sharing your Data

Employees within our organisation who have responsibility for supporting the community and voluntary sector will have access to your data, which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

Your data may also be shared where you give us consent to do, eg: when working in partnership with other organisations.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

How long we keep data

We retain data on the following basis:

Record Type	Retention Period
Members and Trustees personal details	12 months after the last contact
Personal data relating to events for which additional information is gathered.	Disposed of immediately after the event unless consent provided to retain for future event bookings, or unless anything has occurred (eg and accident) which indicates that records should be retained for a longer period.
Records of attendance of children or young people helping at events	Indefinitely for safeguarding purposes

Photographs and videos of events	24 months after the event – selected items retained for historical records
Insurance Records	Indefinitely
Safeguarding records	Indefinitely or until advised otherwise by our Local Safeguarding Authority
Accident Books	3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21)
Complaints (non - safeguarding)	3 years after resolution of complaint (unless further action is anticipated)
Board papers	7 years
Employee Personnel Records	6 years after the date of termination of employment
Pension Records (money purchase)	6 years after transfer or value taken
Visitors Books	Disposed of weekly

Your rights

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you via a Subject Access Request;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) The right to lodge a complaint with the Information Commissioners Office.

Further processing

If we wish to use your personal data for a new purpose not covered in this document then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

For further information you can contact us by email: enquiries@castlecavendish.org.uk or you can contact our appointed compliance officer in relation to data protection activities:- Jane Simpson, 0115 964 8351 : jane@castlecavendish.org.uk.

Concerns

If you have concerns about how we are using your personal data then please contact us in the first instance. If you are not satisfied by our response and you think your data rights have been breached, you are able to raise a complaint with the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.