THE ALA GREEN CHARITABLE TRUST

PRIVACY POLICY

1 INTRODUCTION

Welcome to the Privacy Policy for the ALA Green Charitable Trust.

The Trustees of the ALA Green Charitable Trust respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how we look after any personal data you provide to us and tell you about your privacy rights and how the law protects you.

2 PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how we collect and process any data you may provide by contacting us using the contact details on this website.

This website is not intended for children and we do not knowingly collect data relating to children. Please do not share any data relating to children with us.

It is important that you read this Privacy Policy (together with any other privacy policy or fair processing policy we may provide on any specific occasion) so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

3 CONTROLLER

The Trustees of the ALA Green Charitable Trust are together the "data controller" for the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation 2016/679 This means we are responsible for and control the processing of the personal data that we collect about you (collectively referred to as "we", "us" or "our" in this Privacy Policy).

4 CONTACT DETAILS

If you have any questions about this **Privacy Policy** or our **privacy** practices, please contact us using the details below.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance on:

- Post: We can be contacted by post by writing to us at ALA Green Charitable Trust, c/o Addleshaw Goddard LLP, One St Peter's Square, Manchester M2 3DE
- Email: We can be contacted by email at <u>alagreencharitabletrust@gmail.com</u>

5 CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our Privacy Policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

6 THIRD-PARTY LINKS

This website may include links to third-party websites. Clicking on those links 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 statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

7 THE DATA WE COLLECT ABOUT YOU

What personal data do we collect?

Personal data, or personal information, 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).

If you provide us with data by contacting us using the contact details on this website, we may use, store and transfer that data. This is likely to include:

- Identity Data includes first name, maiden name, last name, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We collect data from and about you through direct interactions, for example, you may give us your **Identity Data** and **Contact Data** by corresponding with us by post, phone, email or otherwise.

How do we use your personal data?

Any data which you provide to us by post, phone, email or otherwise will be used solely for the purposes of making contact with you about your application or enquiry. We do not undertake marketing activities.

Data is retained to enable the Trustees of the ALA Green Charitable Trust to determine whether a person or organisation has applied for support previously to assist them in considering applications.

Under the General Data Protection Regulation the legal basis we rely on for retaining this data is that the trustees have a **legitimate interest** in doing so for the purposes explained above.

You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Change of purpose

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 by using the contact details on this website.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with:

- our professional advisers including lawyers, accountants and auditors who provide legal and accounting services;
- HM Revenue & Customs; and
- the Charity Commission;

in the course of the administration of the ALA Green Charitable Trust.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We do not transfer your personal data outside of the United Kingdom and the European Economic Area (**EEA**).

8 COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. We only use necessary cookies on this website to enable the website to run correctly.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

9 DATA SECURITY

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.

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

10 DATA RETENTION

How long will you use my personal data for?

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, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

In some circumstances you can ask us to delete your data: see "Your legal rights" below for further information.

11 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

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.

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.

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 local law. Note, however, 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.

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.

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.

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. 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.

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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complaints You can make a complaint to us by contacting us via <u>alagreencharitabletrust@gmail.com</u> or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at https://ico.org.uk/.

If you wish to exercise any of the rights set out above, please contact us by using the contact details on this website.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.