

Privacy Policy

We are a registered charity which supports children and young adults to participate in sport and leisure activities by awarding grants to individuals and organisations in Wiltshire and the surrounding area.

We are committed to providing clear information on why we need your personal data and what we do with it. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data.

It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We are responsible as 'data controller' of that personal data for the purposes of the General Data Protected Regulations 2017 and the Data Protection Act 2018.

Key terms

We, us, our	Doing it for Dan
Our data protection manager	Helen Lucas Bridgedale House, New Road, Purton, Wilts, SN5 4HF info@DoingItForDan.co.uk
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Personal data concerning health, sex life or sexual orientation
Processing	Any action in relation to personal data, for example collecting, recording, organising, storing, sharing or destroying data.

Changes to this privacy policy and your duty to inform us of changes

We keep this privacy policy under regular review. This version was last updated in January 2019.

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.

Personal data we collect about you

So that we can help as many people as possible and achieve our charitable purpose, we need to keep certain records about you. We may collect and use the following personal data about you:

- your name (or the name of the third party such as your family who may be making an application on your behalf) and contact information, including address, email address and telephone numbers;
- your date of birth;
- photo and videos of you;
- bank details if we make a grant to you
- details of the services and support that we provide to you;
- your personal interests and sport preferences;
- your feedback on our support; and
- technical data when you visit our website, such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location other technology on the devices you use to access this website.

How we collect your personal data

We collect most of this personal data directly from you in person, by telephone, writing or email. This includes when you:

- make an application for a grant;
- fundraise on our behalf;
- attend our fundraising events;
- subscribe to our mailing list; and
- request marketing to be sent to you.

However, we may also collect or receive personal information from:

- your family, advocate, social worker or other third party on your behalf when making a grant application;
- third party payment services such as Paypal;
- third party fundraising websites such as Virgin Giving;
- our website hosting, development and maintenance service providers; and
- your sport club or federation as part of our due-diligence.

How and why we use your personal information

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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, other than where you sign up to receive news via our website. You have the right to withdraw consent to such mailings at any time by contacting us.

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful bases depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

What we use your personal information for	Our reasons
To review and consider grant applications.	To perform our contract with you or to take steps at your request before entering into a contract.
To arrange an initial meeting with you and / or reply to any questions you have about the services we provide.	To perform our contract with you or to take steps at your request before entering into a contract.
To provide our support services to you.	For the performance our contract with you. To comply with our legal and regulatory obligations.
To obtain the fundraising from our fundraisers.	To perform our contract with you or to take steps at your request before entering into a contract.

What we use your personal information for	Our reasons
	For our legitimate interests (to be as efficient as we can so we can continue to provide our charitable services).
To invite you to our fundraising events.	Necessary for our legitimate interests (to fundraise so that we can continue to provide our charitable services).
Keeping our records up-to-date in relation to the services we provide to you	<p>For the performance of our contract with you.</p> <p>To comply with our legal and regulatory obligations.</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with you, your family and others who are involved in your care and support.</p>
To manage our relationship with you including processing payments, notifying you about any changes to our services, and asking you to provide us with feedback.	<p>For the performance of our contract with you.</p> <p>To comply with our legal and regulatory obligations.</p> <p>For our legitimate interests (to be as efficient as we can so we can continue to provide our charitable services).</p>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies that we are subject to.	To comply with our legal and regulatory obligations.
For administrative and operational reasons and to help us manage our charity.	For our legitimate interests or those of a third party, (for running our business, provision of administration and IT services, security, and in the context of a business reorganisation or group restructuring exercise).

Who we share your personal data with

So that we can provide you with high quality support, we may need to share your personal information with the parties set out below:

- your family, advocate, social worker or the person or organisation who has asked us to provide the services to you;
- our website hosting, development and maintenance service providers;
- service providers who provide IT and system administration services;
- Mailchimp, who provide processing services in respect of collection of personal data and storage of personal data to enable us to send marketing communications to you;
- other third parties and professional advisors we use to help us run our business, e.g. lawyers, bankers, auditors and insurers;
- regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances; and
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

How do we keep your data safe?

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 trustees and other third parties who have a 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.

Information we collect will be held on our secure computer systems. Some of the information we collect will also be kept within your own home. We ask that you keep this as secure as possible.

International transfers of your data

Some of the third party service providers that we use are based outside the EU so their processing of your personal data will involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

How long we will keep your personal data

We will only keep 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 keep 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting our data protection manager.

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

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

What are your legal rights?

Under certain circumstances, you have rights under data protection laws in relation to your personal data. We have set these rights out in the following table:

Right to request access	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
Right to request correction (rectification)	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.
Right to be forgotten (erasure)	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, 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.
Right to request restriction of processing	This enables you to ask us to suspend the processing of your personal data in the following scenarios: <ul style="list-style-type: none"> • 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.
Data portability	This enables you to 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.
Right to object to processing	This enables you to object to the 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. In some cases, we may demonstrate that we have compelling legitimate

	grounds to process your information which override your rights and freedoms.
Withdraw consent	Where we are relying on consent to process your personal data you can withdraw this at any time. 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.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the General Data Protection Regulation.

If you would like to exercise any of your rights, please:

- email, call or write to our data protection manager — see below: ‘**How to contact us**’;
- let us have enough information to identify you, for example your full name and address and provide proof of your identity e.g. your passport or other identity document. This is to make sure that data is not shared with the wrong person inappropriately; and
- let us know what right you want to exercise and the information to which your request relates.

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. We may also contact you to ask you for further information in relation to your request to speed up our response.

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 if you’re not happy with how your data is used?

We hope that we can resolve any query or concern you may raise about our use of your personal data, so if you have a question please do not hesitate to contact us.

The General Data Protection Regulation also gives you right to lodge a complaint with the supervisory authority for data protection issues. The supervisory authority in the UK is the Information Commissioner’s Office who may be contacted at <https://ico.org.uk/concerns> or by telephone: 0303 123 1113.

How to contact us

Please contact us and/or our data protection manager by post or email if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Bridgedale House, New Road, Purton, Wilts, SN5 4HF

info@DoingItForDan.co.uk

Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us using the details above.