



PRIVACY POLICY (WEBSITE)	
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Introduction

At the Selby Trust we rely on the generosity and support of individuals like you to carry out our vital work with community including vulnerable groups such as disadvantaged and young people. That is why we want to be transparent about why we need the personal details we request when you engage with us and how we will use them.

The Selby Trust is committed to protecting the personal data that we collect and process about you. We aim to be clear and transparent and not do anything you wouldn't reasonably expect. We do this by ensuring you are provided with an explanation about how the Selby Trust collects and processes the information you provide us with, or that we collect about you, whether online, via phone, email, in letters or in any other correspondence or from third parties.

We collect and use personal data to ensure that we can manage our relationships with our community and supporters, and to better understand how we can meet and exceed their expectations. This allows us to operate and fundraise more efficiently and effectively to ultimately help us reach our goal that every person in the community should have the chance to succeed.

Please read this policy carefully, along with our Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

The privacy policy covers the following:

- Who we are
- Where the Selby Trust collects its information from
- What information the Selby Trust may collect about you
- How the Selby Trust will use the information we collect

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- How the Selby Trust will update your information
- Where the Selby Trust will disclose your details to anyone else
- How to access, correct or delete your information
- How the Selby Trust uses cookies
- How we keep your data safe
- How long we store your data for
- Changes to the Privacy Policy
- Contact us
- Further information

By providing us with personal information, you consent to the collection and use of this information in accordance with this privacy policy. In accordance with the <u>General Data Protection Regulation 2016/679</u>, we will not keep your personal data for longer than is necessary.

We may update this policy from time to time without notice to you, so please check it regularly.

If you have any questions about this privacy policy and our cookies policy please contact our appointed **Data Protection Officer (Ahmed Mohamed)** at **ahmed@selbytrust.co.uk** or at the Selby Trust using the postal address below.

Who we are

This can be found out in the following link: <u>https://www.selbytrust.co.uk/about-us</u>

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Where do we collect information from?

We collect information in the following ways:

Information you give us

The Selby Trust may obtain personal information from you when, for example, you complete an online form to participate on a programme, register with us for a mailing list, apply to become a volunteer, take part in an event or make a donation.

Information from Third Parties

We may also receive information about you from independent third parties, such as fundraising sites or event organisers such as the <u>National Community</u> <u>Organising Expansion Programme</u>. We will only receive information from third parties in this way if you have given your consent for your information to be passed on to us. You should check their privacy policy when you provide your information to understand how they will process your information. Once we have obtained this information from the third party it will be covered by our privacy policy as well as by the originating third party.

Information we get from your use of our website and services

We collect information about the services you use and how you use them, like when you watch a video on YouTube, visit our websites or view and interact with our ads and content.

Information in the public domain

We may obtain some information from publicly available sources such as Companies House, newspaper articles or open postings on social media such as Facebook and LinkedIn.



What information do we collect?

The types of personal information that the Selby Trust collects may include:

- Your title, name, gender and date of birth;
- Your contact details (address, email, phone number and social media contact details);
- Family and spouse/partner details, relationships to other supporters;
- Your professional activities and employment details;
- Current interests and activities;
- Gift aid status and records of donations;
- Contact preferences;
- Information about your wealth;
- Media articles about you;
- Your IP address, location, browser type and information on how you interact on our website;
- Your bank or credit card details in line with payment card industry standards; and,
- Any other information provided by yourself at the request of the Selby Trust.

Where appropriate we may also ask your interests and motivation for supporting the Selby Trust, although we will never make this question mandatory, and only want to know the answer if you are comfortable providing us with that information.

What might we do with your information?

If you have applied for one of The Selby Trust programmes, the Trust will use your information to run, fund, develop and evaluate our programmes.

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If you support us, for example by making a donation, volunteering, registering to fundraise, or signing up for an event, we will mainly use your information to:

- Provide you with the services, products or information that you asked for, as well as information about other services, products or information we think might interest you where you have consented to being contacted;
- Administer your donation or support your fundraising, including processing Gift Aid;
- Send you surveys, and for market research;
- Invite you to events;
- Keep a record of your relationship with us and record the contact we have with you; and
- Ensure we know how you prefer to be contacted.

Tools may be used to improve the effectiveness of the Selby Trust's communications with you, including tracking whether you open the emails we send you and which links you click within a message.

We may also use personal information to carry out due diligence so that we are fundraising in accordance within the law, the <u>code of fundraising</u> <u>practice</u> and our internal policies and procedures.

In some limited circumstances, the personal information that the Selby Trust collects may include information that is considered 'sensitive data'. This may include personal information regarding racial or ethnic origins, political opinions, religious beliefs, health and also information concerning criminal offences. Where this information is collected we will tell you so you know why it is needed.

If you are under 13 you should ask permission of a parent or guardian before sending personal or sensitive information to anyone online.



Legitimate interests

The law allows personal data to be collected and used by an organisation if it is necessary for the legitimate business interest of an organisation. In broad terms, our legitimate interests' means our interests in being able to run the Selby Trust as a charitable entity effectively in pursuit of our objectives, provided that what the information is used for is fair and does not unduly impact the rights of the individual concerned.

The following are some examples of when and why we would use this approach in our work:

- **Direct marketing:** We will send postal marketing and fundraising requests which further the aims and objectives of the Selby Trust and don't unduly impact the rights of the individual.
- **Profiling and analysing information:** We carry out limited profiling and research to help us understand our donors and potential donors, including gathering information from publicly available resources to give an insight into philanthropic interests and ability to support the Selby Trust. (See below for more details).

Profiling and analysing information of our supporters

- In order to tailor what type and level of support we ask you for, we may analyse personal information we collect about you including how you have engaged with us previously, demographic information, measures of affluence, philanthropic interests and networks.
- We may also use information in the public domain, for example listed Directorships or typical earnings in a given area.
- In some instances, we may use third party wealth screening companies or insight companies to provide us with general information about you.





You can opt out of your data being used for profiling and wealth screening techniques by contacting the **Data Protection Officer**.

How we update your information

We continuously review records of supporters and volunteers to ensure your data is as accurate as possible and always appreciate it if you let us know if your contact details change. Where possible we use publicly available sources to keep your records up to date for example, the Post Office's National Change of Address database, or information provided to us by other organisations. It is important that we keep your personal data as up to date as possible so that we can cross reference your information with the Mail and Telephone Preference Services.

Who might we share your information with?

We are committed to protecting your data and therefore it will never be sold to external organisations and will only be disclosed to those acting as agents and data processors carrying out work on our behalf. Where we enter into a relationship with an external party, any such arrangements will be subject to a formal agreement between the Selby Trust and that organisation to protect the security of your data. They only act under our instructions and we maintain full responsibility for your data.

Third Parties may include:

- **Suppliers** who send out communications on our behalf, such as invitations to our events, for example, email companies;
- Other charities of HRH and our Board of Trustees where we share information for internal procedures and policies only. Should we merge with another organisation to form a new entity, your data may be transferred to the new entity;





• Our **delivery partners** within the UK or abroad to enable us to deliver our programmes effectively.

How to access, correct or delete your information

Under the <u>General Data Protection Regulation 2016/679</u> you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email the appointed Data Protection Officer or write to us at Data Protection Officer, Selby Centre, Selby Road, Tottenham, London N17 8JL.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information that you think is inaccurate.

If you do not want to receive any further information about the Selby Trust and would like us to remove your name from our mailing list, please contact us to let us know. Please address all your requests, by email or mail, to our appointed Data Protection Officer. To help us locate any personal information about you (or in case we need to get in touch with you to obtain further information to help us locate your records) please include your full name, address and telephone number with your request.

How the Selby Trust uses Cookies

Like many websites, we may collect and record information in order for us to understand more about how our website is used and to provide you with a personalised experience when you visit our website. We use 'cookie technology' to do this. We may use cookies to gather certain information about you, including details of your operating system, browser version, domain name and IP address, and the details of the website you linked from to the website. The Selby Trust uses Google Analytics to record this information

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and implements Demographics and Interest reporting, which enables us to better understand website usage and improve the experience for our visitors.

With this cookie data, we use <u>CivicUK.com</u> to analyse and provide a better experience for our visitors.

Cookies identify your browser, and basic information that you have shared with Google to our servers when you visit our website. They do not identify you as an individual. If you do not want to accept cookies you can easily disable this function by changing the settings on your Internet browser. You are able to completely opt out of Google Analytics for Display Advertising and customise Google Display Network adverts through your browser's Advert Settings.

Tailored Content Cookies Local

ONE is used to serve you with information that may be tailored to your use of this website. This tailoring is unique to you and your use of this website and is not shared with any third party. The _one cookie falls under this area and lasts for two years.

Tailored Content Cookies Group

ONE is used to serve you with information that may be tailored to your use of our group of websites. This tailoring is unique to you and your use of our group of websites and is not shared with any third party. The _one_svr cookie falls under this area and lasts for two years.

Tracking Cookies

We do use cookies that track a user across different customer sites.



How we keep your data safe

We aim to ensure that there are appropriate, physical, technical and managerial controls in place to protect any personal information you may provide to us, for example our online forms are always encrypted and our network is protected and monitored. Within our offices all of our staff receives training on handling data securely.

Where we use external companies to collect or process data on our behalf we carry out comprehensive checks on them before we work with them and ensure that contracts are in place that set out our expectations and requirements. We may need to transfer your personal data outside of the European Economic Area (EEA) to allow them to perform services on our behalf. In doing so your data may be stored or processed outside of the EEA. Where this happens we will endeavour to ensure that your data is being processed in accordance with the appropriate security requirements in line with our legal responsibilities, and by submitting your details in such circumstances you agree to this transfer.

Despite all of our precautions no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we will always strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention that you do so at your own risk.

How long we store your data for

We will hold your personal information on our systems for as long as is necessary for the relevant activity. If you request that we stop sending you marketing materials we will keep a record of your contact details and



appropriate information to enable us to comply with your request not to be contacted by us, we won't keep any information that we don't need.

Changes to this Policy

Any changes to this Policy will be notified by displaying the word 'NEW' next to the 'Privacy Policy' link on our Site at least 30 days before putting such changes into effect. This privacy policy was last updated on July 2019.

Contact us

If you have any queries about this policy or any complaints with regard to the administration of the policy please contact our appointed **Data Protection Officer (Ahmed Mohamed)** at **ahmed@selbytrust.co.uk**.

Further information

The laws governing how your personal data can be used are:

- General Data Protection Regulation 2016/679
- <u>The Privacy and Electronic Communications Regulations 2003</u>
- Data Protection Act 2018

We also follow the best practice code set out by the Fundraising Regulator: <u>Code of Fundraising Practice</u>.

You can also contact the Information Commissioner's Office at ico.org.uk to find out more or report a concern. They are the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. We work with them to make sure that we collect, store and use your information appropriately and don't do anything you wouldn't expect us to.



Terms and Conditions

Access to and use of this website is provided by the Selby Trust subject to these terms and conditions.

Creating a User Profile

We may allow you to create a user profile on our website so that each time you visit us we can provide you with a more personalised experience. We may also allow you to subscribe to a particular page of our Site and we may offer you the opportunity to be notified of any changes to that page. We may hold the information you provide us (e.g. when you create a user profile or agree to subscribe to our website) on our databases. By creating a user profile on our website or subscribing to a page of our Site you are agreeing that we may use your personal information in this way. You will have the opportunity to view, update or remove any personal information that you have provided to us by amending your user profile online. You will also have the option to cancel your subscription to our website.

<u>Security</u>

No data transmission over the Internet can be guaranteed to be 100% secure. Therefore, the Selby Trust cannot guarantee that personal or sensitive information remains confidential during transmission over the Internet. All e-mails sent to the Selby Trust will be monitored and checked to ensure our systems operate effectively.

The personal information we collect from you online is stored by us on databases protected through access controls, firewall technology and other appropriate security measures. However, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damage or liability relating to such incidents.



Links to and from The Selby Trust Site

The Selby Trust cannot take any responsibility and makes no warranties, representations or undertakings about the content of any other website accessed by hypertext link. The Selby Trust has no control over the availability of the linked pages.

If you click on a link found on our website or on any other website, you can check the location bar within your browser to find out whether you have been linked to a different website.

Donations, Direct Debit and Credit Card Transactions

In order to process donations and other transactions by Direct Debit or Credit Card you will be put through to the website of one of our partner companies, for example World Pay plc. Credit Card and bank detail information are not retained on our web servers. All of our partner companies who process donations and other transactions use encryption and other security features.

If you are under 18 and use this website for information about fundraising or supporting the Selby Trust, please let an adult know.

<u>Disclaimer</u>

Although every reasonable effort has been made to ensure that the information on this website is accurate at the time of publication, visitors who use this website and rely on any information do so at their own risk. The Selby Trust does not warrant its accuracy and disclaims any liability to any third party anywhere in the world for any injury, damage, loss or inconvenience arising as a consequence of any use of or the inability to use any information on this website to the fullest extent permitted at law.



<u>Copyright</u>

The name Selby Trust and all Selby Trust logos, slogans, programme names and designs are the trademarks, service marks, trade names and design rights of the Selby Trust and cannot be reproduced without the prior written consent of the Selby Trust. Where the names, logos and trademarks of third parties are displayed these are used with the permission of the owners. Copyright in the material contained on this website is owned by the Selby Trust or its content suppliers or licensors, as applicable.

Nothing contained herein shall be construed as conferring any licence by the Selby Trust to use any material displayed. Permission to reproduce any material on this website must be obtained from the copyright holder concerned.

The Selby Trust endeavours to ensure that the information on this website is correct but does not accept any liability for error or omission.

Any questions regarding this website should be sent to the Legal Adviser.

<u>Jurisdiction</u>

These terms and conditions shall be governed and construed in accordance with the laws of England and Wales and any disputes arising hereunder shall be subject to the exclusive jurisdiction of the Courts of England and Wales.