**1 Overview**

1.1 The Charity takes the security and privacy of your data seriously. We need to collect and use information or ‘data’ about you as part of our operations and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 (the ‘2018 Act’) and the EU General Data Protection Regulation (‘GDPR’) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.
1.2 This policy applies to our beneficiaries.   If you fall into this category then you are a ‘data subject’ for the purposes of this policy. We will update this policy from time to time.
1.3 The Charity is a ‘data controller’ for the purposes of your data. This means that we determine the purpose and means of the processing of your data.
1.4 This policy explains how the Charity will hold and process your information.  It explains your rights as a data subject.

**2. Data Protection Principles**

2.1 Personal data must be processed in accordance with six ‘Data Protection Principles.’ It must:
• be processed fairly, lawfully and transparently;
• be collected and processed only for specified, explicit and legitimate purposes;
• be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
• be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
• not be kept for longer than is necessary for the purposes for which it is processed; and
• be processed securely.
2.2 We are accountable for these principles and must be able to show that we are compliant.

**3. How we define personal data**

3.1 ‘Personal data’ means information which relates to a living person who can be identified from that data (a ‘data subject’) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.
3.2 This policy applies to all personal data whether it is stored electronically, on paper or on other materials.
3.3 Your personal data will have been provided by you either by filling in your details on the Grant Application Form or contacting us directly where we have asked you for such information.
3.4 We will collect and use the following types of personal data about you:
• your name
• your address
• your email address
• your phone number
• other personal data as per the Grant Application form, such as care status.
**4. How we define processing**

4.1 ‘Processing’ means any operation which is performed on personal data such as:
• collection, recording, organisation, structuring or storage;
• adaption or alteration;
• retrieval, consultation or use;
• disclosure by transmission, dissemination or otherwise making available;
• alignment or combination; and
• Restriction, destruction or erasure.
4.2 This includes processing personal data which forms part of a filing system and any automated processing.

**5. How will we process your personal data?**

5.1 The Charity will process your personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.
5.2 We will use your personal data for:
• performing an agreement between us (e.g. to provide you with financial support);
• complying with any legal obligation; or
• if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights in section 11 below.
5.3 We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.
5.4 If you choose not to provide us with certain personal data you should be aware that we may not be able to award the grant.

**6. Examples of when we might process your personal data**

6.1 We have to process your personal data in various situations.
For example:
• to be able to support you;
• to provide you with details of our activity;
• to assess whether we can offer you a grant;
• to monitor and protect the security (including network security) of the Charity, of you, our other staff, clients and others;
• to monitor and protect the health and safety of you, other clients, and third parties;
• running our operations and planning for the future;
• the prevention and detection of fraud or other criminal offences;
• to defend the Charity in respect of any investigation or litigation;
• for any other reason which we may notify you of from time to time.
6.2 We do not take automated decisions about you using your personal data or use profiling in relation to you.

**7. Sharing your personal data**

7.1 Sometimes we might share your personal data with external organisations to carry out our obligations to you when it is necessary, for example if there is a safeguarding concern.
7.2 We sometimes use other third-party individuals and organisations to provide services to our beneficiaries. We do not pass anyone’s personal information to those individuals and organisations without your permission.
7.3 We require any charities/companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

**8. How should you process personal data for the Charity?**

You should direct any questions in relation to this policy or data protection to Liz Small in the first instance.

**9. How we deal with data breaches**

9.1 We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then you must take notes and keep evidence of that breach and we need to be informed immediately. If the breach is likely to result in a risk to the rights and freedoms of individuals then we must also notify the Information Commissioner’s Office within 72 hours.
9.2 If you are aware of a data breach you must contact Liz Small immediately and keep any evidence you have in relation to the breach.

**10. Subject access requests**

10.1 Data subjects can make a ‘subject access request’ (‘SAR’) to find out the information we hold about them. This request must be made in writing and sent to Liz Small to process and who will coordinate a response.
10.2 We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.
10.3 There is no fee for making a SAR.

**11. Your data subject rights**

11.1 You have the right to information about what personal data we process, how and on what basis as set out in this policy.
11.2 You have the right to access your own personal data by way of a subject access request (see above).
11.3 You can correct any inaccuracies in your personal data. To do you should contact Liz Small.
11.4 You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact Liz Small.
11.5 While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made. To do so you should contact Liz Small.
11.6 You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
11.7 You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
11.8 You have the right to be notified of a data security breach concerning your personal data.
11.9 In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact Liz Small

11.10 You have the right to complain to the Information Commissioner. You can do this be contacting the Information Commissioner’s Office directly. We envisage that you will have made contact with the charity who will seek to review the issue in the first instance. Full contact details including a helpline number can be found on the Information Commissioner’s Office website (www.ico.org.uk). This website has further information on your rights and our obligations.
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