

6. Data Protection

Policy:	Data Protection
First approved:	3 rd December 2015
Last reviewed:	11 October 2018
Due for review:	October 2021

1.0 Introduction

The Triangle Trust collects and uses personal data about people with whom it works. This includes current, past and future employees, Trustees, current, past and future grant applicants and gift recipients.

This policy applies to all personal data processed by the Trust and shall be reviewed every 3 years.

The Triangle Trust does not meet the requirements to make registration with the Information Commissioner's Office (ICO) compulsory. However, the Triangle Trust regards the lawful and correct treatment of personal information as very important to its successful operation and to maintaining confidence between the Trust and those with whom it deals. To this end the Trust fully endorses and adheres to the Principles of Data Protection, as set out in the General Data Protection Regulation 2018 (GDPR), Data Protection Act 2018 (DPA) and Privacy and Electronic Communication Regulations 2003 (PECR).

2.0 Purpose

The purpose of this policy is to ensure the staff and Trustees of the Triangle Trust are clear about the purpose and principles of Data Protection and to ensure the Trust has guidelines and procedures in place which are consistently followed.

Failure to adhere to GDPR, DPA and PECR is unlawful and could result in legal action being taken against the Triangle Trust, its staff or Trustees.

3.0 Data Protection Principles

Personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals.
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction.

4.0 Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Triangle Trust shall publish a Privacy Notice (see Appendix 1) and maintain a Register of Systems (see Appendix 2).
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

5.0 Lawful purposes

- a. All data processed by the Triangle Trust must be done on the lawful basis of consent or legitimate interest.
- b. The Trust shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Trust's systems.

6.0 Data Minimisation

- a. The Triangle Trust shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7.0 Accuracy

- a. The Triangle Trust shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

8.0 Archiving/Removal

- a. To ensure that personal data is kept for no longer than necessary, the Triangle Trust shall detail the archiving/removal system within the Review of Systems for each area in which personal data is processed and review this process annually.
- b. The archiving/removal system shall consider what data should/must be retained, for how long, and why.

9.0 Security

- a. The Triangle Trust shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

10.0 Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Triangle Trust shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Appendix 1 - Triangle Trust Privacy Notice

This privacy notice sets out how the Triangle Trust 1949 Fund uses and protects any personal information that you give us. We are committed to ensuring that your privacy is protected.

What we collect

If you apply to us for a grant, have previously received a grant or are currently in receipt of a grant or a gift we will have collected your contact details including your name, job title, email address, telephone number and postal address.

If you register to receive mailings from us we will collect your name and the email address that you wish our mailings to be sent to.

What we do with the information we gather

When we collect and use your personal information we will make sure this is only done in accordance with at least one of the legal grounds available to us under Data Protection law as follows:

- If you have applied to us for a grant or are currently in receipt of a grant or a gift your details may be used to assist with administering the programme, monitoring grants, evaluating funding processes and impact and carrying out research to improve our grant making.
- If you have signed up to our newsletter we will use the email address you have provided to send electronic notifications of funding opportunities and other updates which are relevant to those interested in our grants, including carefully selected promotional information from third parties which we feel would interest you.

The Triangle Trust 1949 Fund will not share your personal information with any third parties unless we are required by law to do so or a third party has been contracted by us to perform the activities referred to above on our behalf.

In all cases, we balance our legitimate interest against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Privacy Notice and that does not intrude on your privacy or expressed mailing preferences.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). Where this is the case we will ensure that data is transferred securely in accordance with the General Data Protection Regulation.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

How we use Cookies

A cookie is a small file sent by web servers which is placed on your computer or device. This enables the web server to identify and track individual web browsers. This includes general information about your computer's operating system, browser and version, your IP address and/or domain name, your search engine (if you came to our site via a search), and the pages of our website which you visit.

The Triangle Trust uses Google Analytics cookies to monitor our website performance and how visitors may be using our site. These cookies provide us with statistics and other information to identify areas that may need maintenance on our website and to discover where visitors to our website may have come from.

We collect no personal information about you when you visit our website unless you choose to provide this information to us by registering for our newsletter or our grantee forum. All information collected by Google Analytics cookies is anonymous.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.

Links to other websites

Our website may contain links to other websites of interest. However, you should note that we do not have any control over other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may wish to restrict the collection or use of your personal information in the following ways:

- If you have previously agreed to us using your personal information to send you notifications of funding opportunities and other updates which are relevant to those interested in our grants, you may change your mind at any time by clicking on the unsubscribe button at the bottom of all mailings or by emailing us at info@triangletrust.org.uk.
- You may request that any personal information we hold about you is removed from our records. Where this is a lead contact during a live grant this must be replaced with an alternative lead contact.

Access to information

You may request details of the personal information which we hold about you. If you would like a copy of the information held on you please email info@triangletrust.org.uk or write to the Triangle Trust 1949 Fund, Brighton Junction 1a Isetta Square, 35 New England Street, Brighton BN1 4GQ
If you believe that any information we are holding on you is incorrect or incomplete, please write to us or email us as soon as possible, at the above address so that we can correct it.

Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us by email at info@triangletrust.org.uk.

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