

Privacy Policy

1. Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, e-mail address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

2. White Horse Development Trust CIC information

This Privacy Policy is provided to you by White Horse Development Trust CIC, which is the data controller for your data.

- Correspondence and Office address: White Horse Public House, Chapel Road, Upton, Norwich NR13 6BT

3. Who are the data controllers?

- Mike Smith, Data Protection Officer, White Horse Development Trust CIC (The ‘Trust’)

4. What personal data is collected?

- Names, titles, any aliases, video;
- Contact details such as telephone numbers, addresses, and e-mail addresses;
- Where they are relevant to the services provided by us, or where you provide them to us, we may process demographic information such as gender, age, marital status;
- Where you pay for activities or facilities, identifiers such as bank account numbers;
- Website data:
 - Subscribers’ e-mail addresses
- Information collected automatically from use of the service:
- Interaction with e-mail messages
- Any communications you send the Trust – paper, e-mail, Facebook message

5. The Trust will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

6. We use your personal data for some or all of the following purposes:

- To deliver services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
 - To confirm your identity to provide some services;
 - To contact you by post, e-mail, telephone
 - To help us to build up a picture of how we are performing;
 - To prevent and detect fraud and corruption in the use of Trust funds and where necessary for law enforcement functions;
 - To enable us to meet all legal and statutory obligations;
 - To promote the interests of the Trust;
 - To maintain our own accounts and records;
 - To seek your views, opinions or comments;
 - To notify you of changes to our facilities, services, events and staff, and directors;
 - To send you communications which you have requested and that may be of interest to you. These may include information about events, campaigns, appeals, other new projects or initiatives;
 - To allow the statistical analysis of data so we can plan the provision of services.
- Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

7. What is the legal basis for processing your personal data?

The Trust has certain duties. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the Trust's legal functions. Sometimes when exercising these functions, it is necessary to process personal data of directors, staff and shareholders. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the Trust's obligations to you in detail.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

8. Sharing your personal data

The Trust will implement appropriate security measures to protect your personal data. This section of the Privacy Policy provides information about the third parties with whom the Trust will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software.

9. How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a community trust. The Trust is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we

will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

10. Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- (i) The right to access personal data we hold on you**
- (ii) The right to correct and update the personal data we hold on you**
- (iii) The right to have your personal data erased**
- (iv) The right to object to processing of your personal data or to restrict it to certain purposes only**
- (v) The right to data portability**
- (vi) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**
- (vii) The right to lodge a complaint with the Information Commissioner's Office.**

You can contact the Information Commissioners Office on 0303 123 1113 or via e-mail <https://ico.org.uk/global/contact-us/e-mail/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

11. Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

13. Changes to this policy

We keep this Privacy Policy under regular review. This Policy was last updated in November 2019.

14. Contact Details

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller, White Horse Development Trust CIC, Chapel Road Upton, Norwich, NR13 6BT
E-mail: WhiteHorseCommittee@gmail.com