

## **Rotary's Waverley-wide Covid Support Fund – Privacy Policy**

At the Fund, we are committed to protecting your personal information and being transparent about what we do with it. We will not do anything with your information that you wouldn't reasonably expect.

### **1. Your Privacy**

This Privacy Policy sets out how and why we obtain, use, share and protect your personal information. For these purposes, Rotary Club of Godalming Woolsack Charity Trust Fund is the Controller of your personal information in accordance with the General Data Protection Regulation and other UK data protection laws. We may change this Privacy Notice from time to time.

### **2. Who we are**

Rotary Club of Godalming Woolsack Charity Trust Fund is a charity registered in England and Wales with registration number 1079545.

### **3. How we collect your information**

We may collect your personal data in a number of ways, for example:

- When you communicate with us by post, email or other forms of electronic communication;
- When you make a donation to us, either directly or via JustGiving or other donation routes;
- When you apply to us for support.

### **4. The categories of data we collect**

We may collect the following categories of personal data about you:

- Your name and contact information such as address, email address and telephone number (and, on an ongoing basis, any change of address details);
- Bank account, bank card or credit card details (in respect of making a donation or receiving a grant);
- Date of birth, gender, health/disability information and information relating to your relationship status and financial status (in respect of eligibility for grants);
- Information concerning your engagement with the Fund, including records of communications between you and us and your attendance at any meetings;

### **5. The basis for processing your data and how we use that data**

#### **1. Legitimate interests**

We may process your personal data because it is necessary for our or a third party's legitimate interests. This will always be weighed against your rights, interests and expectations. Our legitimate interests include the operation of the Fund in accordance with our charitable objects.

Examples of where we process personal data in accordance with our legitimate interests include:

- To correspond with you about our charitable services, including applications which you may have made to us;
- To process donations and payments, and to ask for further support by post, telephone or other electronic means if you have done so in the past;
- To evaluate whether you may qualify for a grant (either from the Fund or from another charity to which we may refer your application) and to process and record your grant application, and make any payments as applicable;
- Processing technical information about your use of our website to ensure that content on our website is presented in the most effective manner;
- Processing enquiries and complaints;
- Carry out research and analysis, either in house or via a third party, of the services we provide so that we can improve these in future

## 2. Legal obligations

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data to comply with subject access requests of others, tax legislation (including processing Gift Aid claims), safeguarding requirements (for example those required by the Charity Commission), for the prevention and detection of crime, and in order to assist the police and other competent authorities with investigations (including criminal investigations).

## 3. Consent

In some circumstances we may seek your specific consent to process your personal data: for example:

- If we wish to use your name, likeness or an attributed quote in our newsletter, on our website or in marketing materials or as a case study to demonstrate the impact of our work;
- Sending marketing communications in relation to appeals, our services, events and resources by, electronic mail and SMS, in respect of which we operate an 'opt-in' communications policy;
- As part of our assessment of application we may ask for additional medical/health information ('special category data' for which your explicit consent is required for processing);

If you have given your consent and you wish to withdraw it, please contact us using the contact details below. Please note that where our processing of your personal data does not rely on your consent, we may not be able to fulfil your request (please see Your Rights section below).

## **6. When your personal data may be shared with others**

For the purposes referred to in this Privacy Notice, and relying on the bases for processing as set out above, we may share your personal data with certain third parties, including:

- Our volunteers, agents and contractors where there is a legitimate reason for their receiving the information;
- Third parties whom we engage to assist in delivering our services to you;

- Other charities (when we believe they may be better able than us to assist you);
- Our bank, to whom payment details are provided in order to process donations and payments;
- Our website operator, who may store details such as name and email address (for example in respect of our e-newsletter mailing list);
- Internal and external auditors;
- Our professional advisers and/or insurers where it is necessary for us to obtain their advice or assistance;
- Professionals who assist us in putting together, printing and delivering our newsletter (and other materials) and website content, and our IT support and data storage provider(s);
- When we are legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by the Charity Commission.
- When carrying out research and analysis in order to improve our services.

We will never share your personal details with third parties for their own marketing purposes.

## **7. Retention of your data**

We may retain your personal data for as long as it is necessary to deliver our charitable services; and to protect our legal interests (for example where required by relevant authorities or for a reasonable legal limitation period after we have ceased providing grant funding or services); or as otherwise stated to you when your data is collected; or for such period as we reasonably consider appropriate in connection with our relationship with you and/or the organisation you represent/ed; or for record-keeping and archival purposes.

## **8. International transfers**

As a matter of course, we do not transfer your personal data outside the European Economic Area (EEA) with the exception of organisations that adhere to the Privacy Shield Framework. We may, however, transfer your personal data around the world on an ad hoc basis, if required for our legitimate interests.

## **9. Your rights**

You have the following rights:

- To be informed what personal data we hold about you and/or to obtain access to it (i.e. by receiving a copy of it in a permanent form);
- To require us not to send you direct marketing communications;
- To require us to correct the personal data we hold about you if it is inaccurate;
- To require us (in certain circumstances) to erase your personal data;
- To request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);

- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute and we may be entitled to refuse requests where exceptions apply: for example if we have reason to believe the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Notice.

You can find out more about your rights under data protection legislation at the Information Commissioner' Office website.

### **11. Questions and concerns**

If you have queries or requests, such as unsubscribing or changing your details, please contact

By email: [rotaryc19fund@gmail.com](mailto:rotaryc19fund@gmail.com)

By post: Rotary's Waverley-wide Covid Support Fund, c/o Godalming Town Council, Municipal Buildings, Bridge Street, Godalming, GU7 1HT.

Last updated: 23<sup>rd</sup> January 2021