Privacy Notice for Donors, Beneficiaries, Trustees and Website Users

WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE?

The Geoffrey Harrison Foundation Limited is a charitable company that takes its data protection obligations very seriously. We are grateful for your interest in the Foundation and we are committed to keeping your personal information safe.

This Privacy Notice aims to give you information on how The Geoffrey Harrison Foundation Limited ("Foundation", "we", "us", "our") collects and processes your personal data through your use of our website located at www.geoffreyharrisonfoundation.org.uk ("Website"), when you make a donation to the Foundation, when you apply for or receive funding from us, if you are a trustee and/or you otherwise communicate with us.

It is important that you read this Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

If you work for an organisation that receives funding from us or otherwise contacts us in relation to our activities, you should be aware that the organisation may provide certain information relating to you to us for our use in connection with your organisation's enquiry or the provision of funding (e.g. where you are a contact for the organisation). Please direct any queries that you have regarding your organisation's provision of, control of and access to your information, to your organisation.

Our Website uses cookies. Please refer to our Cookie Notice for more information about the cookies we use and the purposes for which we use them.

Amendments and updates to this Notice may be made from time to time. Any revisions will be posted on this page, so you will always be aware of what information we collect and how we use that information. Please review this page regularly so that you are aware of any changes.

1. WHO WE ARE AND HOW TO CONTACT US

For the purposes of data protection laws, The Geoffrey Harrison Foundation Limited a company registered in England and Wales with Company No 07570613 (registered charity number 1142242) and whose registered office address is at Oxford House, Oxford Road, Thame, OX9 2AH is the data controller.

If you have any questions about this Notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Email: enquiries@geoffreyharrisonfoundation.org.uk
Post: Data Privacy, The Geoffrey Harrison Foundation, Oxford House, Oxford Road, Thame, OX9 2AH

2. CHANGES TO YOUR INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information (e.g. name or address) changes during your relationship with us so that we can update our records.

3. THE PERSONAL DATA WE COLLECT

"Personal *data*" (also referred to in this Notice as "*personal information*" or *"information"*), means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Information you provide

- We will collect information relating to you that you provide when you:
  - fill in an enquiry form on our Website or otherwise contact us;
  - make a donation to the Foundation;
  - engage with us via our social media channels;
  - take part in our research projects;
  - act as a trustee and/or
  - opt-in to receive further information from us.

  This information includes personal information, such as your full name, email address, postal address and telephone number, job title, department and our communications with you. If you donate to us we will record the amount of your donation and whether you are a UK taxpayer.

- If you apply to be a trustee we will also collect your date of birth, details of your other interests and the results of vetting checks.

Information we collect about you

- For each of your visits to our Website, we may automatically collect the following information:
  - technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our office.

Information we receive from other sources

- We may receive information regarding you from your organisation where we provide the organisation with funding or apply for funding;

- If you attend a course funded by the Foundation, we may ask for your consent or where appropriate your parent's consent to take photographs and will explain how those photographs may be used;

- We may receive information regarding you from third parties that we work with (for example colleges or universities) and they will comply with their own privacy notices in sharing this information.

4. HOW WE USE YOUR INFORMATION

We will only process your personal data when the law allows us to and for the purposes set out in this Notice. The lawful bases upon which we will process your personal data are:

- when you give your consent;
- when necessary for the performance of a contract we have entered into or are entering into with you;
- when necessary to comply with a legal or regulatory obligation;
- for our legitimate interests or those of a third party, provided that your interests and fundamental rights and freedoms do not override those interests.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or funding). We will notify you if this is the case at the time.

We may also use your personal data to meet our legal obligations, to deal with any complaints and for the enforcement of our terms and conditions.

We may use your personal data for our legitimate business interests which include security purposes and for the prevention and detection of crime, improvements to our Website, improvements to our operations as a charity and for fundraising purposes. We will not do so though where our interests are outweighed by your interests, rights and freedoms.

We have set out below further details of how we will use your information:

- **Communications and Provision of Services**

We will use your contact details to communicate with you and to respond to any enquiries. We will also use your contact details in the fulfilment of our charitable objectives.

Should you choose to contact us using any of our contact forms or email links on our Website, the information you submit will only be used to respond to and deal with your enquiry. We will not use this information for any other purpose, for example we will not send marketing or fundraising communications unless you are requesting that information.

- **Data relating to children**

We provide funding to colleges and universities and may collect information about the children who attend the courses that we fund and their subsequent education and career choices to measure the effectiveness of our funding. Where we do so we will obtain consent from the parent/legal guardian.

- **Personal information collected by our Website**

Our website uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. This information does not identify you personally to us.

Google Analytics records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. Google Analytics also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. Google Analytics makes use of cookies; disabling cookies on your internet browser will stop Google Analytics from tracking any part of your visit to pages within this website. Please see our Cookies Policy for more information on the use of cookies across the Website.

- **Donor and beneficiary feedback**

This includes information that you voluntarily share with us about your experience in dealing with the Foundation and is used for our legitimate interests to allow us to develop and improve our charitable activities.

- **Fundraising Communications and Newsletters**

We may use your personal information to form a view on what we think you may want or need, or what may be of interest to you. Where we do so it is for our legitimate interests.

You may also receive fundraising emails from us if you have subscribed to receive them or we are otherwise permitted to send them to you (eg. where you are a corporate subscriber or existing donor).

You can ask us to stop sending you fundraising emails at any time by following the opt-out links on any fundraising email sent to you or by contacting us at any time at the address below.

Where you opt out of receiving these fundraising emails, we may still contact you for other purposes where we have a lawful basis to do so.

We will get your express opt-in consent before we share your personal information with any other organisation.

5. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like to have an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out in section 1.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We will not sell your personal data however we may share your personal data in the following ways (as appropriate):

- as required by HMRC in order to claim gift aid;
- in order to comply with any legal obligation or as otherwise permitted by law;
- for security purposes or to protect our rights or those of a third party;
- in the conduct or defence of legal claims; and
- for the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any personal data that we collect with the Police, other public or private sector agencies, governmental or representative bodies in accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies and/or other agencies.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those trustees, agents, contractors, corporate funders, professional advisors and other third parties who have a business need to know and access the same. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your information is stored on our servers within the EU. We take reasonable steps to ensure that any third parties hosting our Website and our other services have adequate security measures in place to protect personal data.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Where processing is based on your consent, we shall only process your personal data until such time as you withdraw your consent unless we have another lawful basis on which we can continue to process your personal data.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal

data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

We will take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Notice.

9. YOUR RIGHTS IN RELATION TO YOUR DATA

Under data protection laws you have the following rights in respect of your personal data:

- to request information regarding the personal data that we hold about you and the source(s) of that information. You can request a copy of any personal data we hold about you. This service is usually free of charge, although we have the right to charge a 'reasonable fee' in some circumstances;
- to request that we rectify any inaccuracies in relation to the personal data we hold;
- in some circumstances, to request the erasure of your personal data or request the restriction of processing;
- in some circumstances to object to the processing of your data. You have an absolute right to object to any direct marketing;
- in some circumstances, to request that your personal data be transferred to you or a new provider if the data is processed automatically;
- to withdraw consent to us processing your personal data. This will not affect the processing already carried out with your consent; and

10. EXERCISING YOUR RIGHTS

If you wish to exercise any of the rights set out above, please contact us at data@harrisoncatering.co.uk.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to a person who does not have the right to receive it.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. COMPLAINTS

Speak To Us First

If you are unhappy with our response to a request to exercise your rights as set out in the previous paragraph, please contact us in the first instance.

We shall acknowledge receipt within 30 days of receiving the complaint and (if required) obtain further information from you. We shall then, without undue delay, take appropriate steps to respond to your complaint and inform you of the outcome of your complaint.

If Not Resolved To Your Satisfaction

If you are unhappy with the outcome of your complaint, you have the right to raise the complaint with the Information Commission (known as the "ICO") (www.ico.org.uk).

Our registration number for the ICO is Z1150207.

12. LINKS

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.