



Privacy Policy – 25-03-20

Introduction

The Poole Communities Trust is an independent charity whose purpose is to promote economic and community growth across Poole in Dorset. We primarily do this through the development of community facilities and creating places where people have the chance to thrive.

We are committed to respecting and protecting any personal data you share with us, or that we get from partner organisations. We aim to be clear when we collect your data and about what we will do with it.

This policy describes how and why the Poole Communities Trust uses your personal information, how we protect your privacy and your choices regarding this information.

Please read the policy carefully as by providing your personal data to the Poole Communities Trust, you will be deemed to have consented to the processing of such data.

This policy is effective from 25-03-20

Who we are:

In this policy, Poole Communities Trust, registered charity 1165309

How we collect information about you

We collect information in a number of ways. You may give us your information in order to:

- attend one of our events or locations
- purchase one of our products, memberships or rent one of our spaces
- register as a volunteer or advocate
- make a donation in support of our work
- join one of our professional networks or advocate groups
- submit a enquiry
- partner with us for a project or joint venture
- when you sign up for Poole Communities Trust e-newsletters
- set up a user account on our website
- when you sign in to our wi-fi
- when you provide feedback or email us
- when you apply for a job at the Poole Communities Trust
- otherwise communicate with us

We may collect information when you visit our website

We may also gather information about you from your use of our website, such as which pages are most visited and which events or facilities are of most interest.

When you use our website, we collect your personal information using cookies and other tracking methods.

Cookies are very small text files saved to your computer used to track user navigation around a website. The cookies collect information such as the number of visitors to the site, which pages they visited and whereabouts they came to the site from. This information is anonymous and cannot be used to identify you personally.

Your browser help text will contain information about how to reject cookies from our Site. Rejecting cookies from our Site will not affect your ability to experience the site although it will prevent us from tailoring the website to your interest. For further information about the cookies that we use, please visit our <https://poolecommunitiestrust.org.uk>

We also use Google Analytics to collect information about how our visitors use and navigate our website. We use this information to improve our website and to ensure we provide the best services for our users.

Third party cookies

During your visits to the website you may be delivered cookies by third-party websites. When you visit a page with content embedded from, for example, Facebook, Vimeo, Twitter, Instagram or YouTube, you may be presented with cookies from these websites. Poole Communities Trust does not control the dissemination of these cookies. You should check the third-party websites for more information about these.

You may provide information to us indirectly:

Your information may be shared with us by third parties, for example:

- Gocardless, Stripe, our payment service providers for Directory subscriptions and product sales transactions.
- Eventbrite or similar third party ticketing sites
- Sponsors or commercial and creative partners who are participating in joint activities with the Poole Communities Trust
- Fundraising sites such as Just Giving

We also may receive data about you from subcontractors acting on our behalf who provide us with technical, payment or delivery services, and from business partners and advertising networks.

You should check any privacy policy provided to you where you give your data to a third party.

We may gather information from other sources:

Social Media

Settings or the privacy policies for social media and messaging services like Facebook, Instagram or Twitter may give us permission to access information from those services, for example when you publicly tag us in a photo.

Publicly available information

We supplement information on our supporters with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media

accounts, the electoral register and Companies House in order to create a broader understanding of someone's interests and support of the Poole Communities Trust. Please see our section on Supporter profiles below.

Potential new supporters and donors

We may collect information on potential new supporters or donors who might be interested in becoming involved with the Poole Communities Trust but will only do this where we have a legitimate interest and have carried out a legitimate interest assessment.

What information do we collect?

We will collect personal details appropriate to the service you choose to sign up to or the product you buy. We collect, store and use the following kinds of personal information:

- your name
- your contact details (including postal address, telephone number, e-mail address, employer contact details, and/or social media identity)
- your date of birth
- your bank or credit card details where you provide these to make a payment. These are stored in accordance with Payment Card Industry regulations
- if you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include employment status, previous experience depending on the context, as well as any unspent criminal convictions or pending court cases you may have)
- information about your activities on our website(s) and about the device you use to access these, for instance your IP address and geographical location
- information as to whether you are a taxpayer to enable us to claim Gift Aid
- any other personal information you provide to us.

In addition to your personal data, we may also ask for your preferences so that we can send you information that is tailored to your interests.

Certain types of personal information are in a special category under data protection laws, as they are considered to be more sensitive. Examples of this type of sensitive data would be information about health, race, religious beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information.

We only collect this type of information about our supporters to the extent that there is a clear reason for us to do so, for example where we ask for information for the purpose of providing appropriate facilities or support, or in order to monitor the effectiveness of our programmes.

Wherever it is practical for us to do so, we will make why we are collecting this type of information clear and what it will be used for.

How we use your information

The Poole Communities Trust will use your personal information for the following purposes:

- to provide you with the services, products or information you have requested from us. This could include fulfilling sales contracts you have entered into with us, or servicing your subscriptions with us
- where you have given your consent, provide you with information by email which we feel may interest you. This could include requests for your support.
- where we have a legitimate interest, provide you with information about our work or our activities by post. This could include requests for your support
- to telephone you if you have provided us with your telephone number and have not registered with the Telephone Preference Service.
- for customer service or administrative purposes (for example we may contact you regarding a donation you have made or an event you have registered or booked a ticket for)
- to manage and promote our projects and sites
- for internal record keeping, including the management of any feedback or complaints
- contact you to respond to your queries (if you email us with a question, for example)
- to target communications and messages to you and to identify similar groups of prospective customers
- to track user visits to our website and record navigation across our website and in addition to track whether our emails are opened and read
- To invite you to participate in surveys or research
- To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic or to personalise the way our information is presented to you

Working with suppliers and partners

In some cases we work with external suppliers and partners to provide certain services. All partners and suppliers will be screened to ensure they comply with legislation and where required data processing and confidentiality agreements will be in place.

Sending marketing communications

Our e-newsletters include information about our latest projects, events and fundraising. We may also include highlights from activities delivered by external organisations as well as information and offers from the partner organisations that support our work.

We operate an opt-in only communication policy. This means that, except as set out below, we will only send marketing communications to those that have explicitly stated that they are happy for us to do so.

We will collect information on open rates and click throughs to assess and improve our newsletters and any other information you provide whilst subscribing through this form.

We may use information you have given us directly, for example the record of your previous donations to and/or relationship with us, your location and demographics, as well as the type of activity you have been involved with, to tailor our communications with you about future activities.

Managing your contact preferences

We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms will always have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us you can change your preferences at any time.

If you've decided you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing a donation you've made and any related Gift Aid, thanking you for a donation or participation in an event, activities relating to your participation in any Poole Communities Trust activities for example, volunteering activities you have undertaken with us or in relation to products or services you have purchased from us.

Building profiles of supporters

Our work to improve communities within Poole is only possible thanks to the generosity of our supporters so it's vital that our fundraising efforts are as effective as they can be. Developing a better understanding of our supporters by researching them using publicly available sources ensures we can tailor and target our fundraising activities and communications to those most likely to be interested in them. This allows us to be more efficient and cost-effective with our resources.

What information do we collect?

After taking a supporters communications preferences into account, we may use the information we hold on them to research their potential to be a significant donor to the Poole Communities Trust and collect additional details relating to their employment and any philanthropic activity.

How we may contact you

By email

We will contact you by email if you have given us your email address and we are emailing you to provide the services you have requested.

We may also contact you by email if you have bought a service or goods from us and we want to contact you about similar goods or services.

We may in addition contact you for marketing purposes by email if you have given us your consent to do so. This may include requests for your support through a variety of different fundraising initiatives such as requesting donations, inviting you to attend special events, or encouraging you to purchase tickets or products. If you enter your contact details into one of our online forms, we may use this information to contact you, even if you don't click submit on the form, but we will only do this to see if we can help with any problems you might be experiencing with the form or with our website.

By post

If you have provided us with your postal address we may send you direct mail about our work and our fundraising campaigns, unless you have told us that you would prefer not to receive such information. We will carry out a legitimate interest assessment to ensure that we are

satisfied that you would reasonably expect such communications from us and would not consider it to be intrusive. For example, we may want to post you an invitation to an event we think you may be interested in.

You may not have given us your data yourself. If we have received your data from a third party, we will only contact you if you have given the third party clear consent to enable us to do so. Otherwise, if you have not given us your data yourself, we will only contact you by post where we have a legitimate interest to do so.

By telephone

If you haven't supplied us with your telephone number, before telephoning you (unless it is in connection with the service we are delivering to you) we will check with the Telephone Preference Service.

Business to business communications

If we are communicating to you on a business to business basis we will contact you by post or email, unless you have let us know that you would prefer us not to do so

Legitimate interest

We consider that we have a legitimate interest in furthering the charitable aims of the Poole Communities Trust by engaging the public in the future developments of our sites and activities. In order to do so, we need to be able to tell people about our work and to raise funds by donations and sponsorships or through our commercial activities.

How we keep your information safe

We will either store your data on our own servers or in the Cloud.

We may on occasion need to use the services of a supplier outside the European Economic Area (EEA) for this purpose, however we will ensure that your information is held in compliance with the General Data Protection Regulations. We ensure that there are appropriate technical and organisational controls (including physical, electronic and managerial measures) in place to protect your personal details.

How long we keep your information for

We keep your personal information for as long as required to deliver the service we are providing or for archival purposes and in accordance with legal requirements and tax and accounting rules. If you have not engaged with us for a period of three years and we do not need to keep your personal data for archival, legal or business reasons, we will delete or suppress your personal information. Where your information is no longer required, we will dispose of it securely.

If you have told us that you do not want to hear from us at all or by a particular channel, we will hold the minimum amount of your personal data on a suppression list to ensure we comply with your request.

Sharing your information with other organisations

We will never sell or rent your information to third parties for marketing purposes. However we may disclose your information to third parties in connection with the other purposes set out in this policy. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf;
- analytics and search engine providers;
- IT service providers.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider this necessary, to protect the rights, property or safety of the Poole Communities Trust, its personnel, visitors, users or others.

Other websites

Our website may contain links to other websites which are outside our control and are not covered by this privacy notice. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

How to change or delete your data

You have the right to ask us to amend or stop using your personal information, including for marketing purposes, at any time.

You may opt out of marketing emails, or change any of your preferences, at any time by clicking the unsubscribe link in our marketing emails or by visiting our website and making contact with us to inform us of your request.

The accuracy of your information is important to us. You can edit your Poole Communities Trust website account information, including your address and contact details at any time. If you would like to change your preferences or update the details we hold about you, please contact: hello@poolecommunitiestrust.org.uk

You have a right to ask for a copy of the information we hold about you, although we may charge £10 to cover the costs involved. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, send a description of the information you want to see and proof of your identity by post to:

DPA

Poole Communities Trust

Branksome Community Centre, Recreation Road, Poole, Dorset, BH12 2EA

We do not accept these requests by email so we can ensure that we only provide personal data to the right person. Enquiries will take up to 30 days to process.

If you have any questions please send these to the address above, and for further information see the Information Commissioner's guidance ([link below](#)).

Complaints

If you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You also have the right to lodge a complaint about any use of your information with the [Information Commissioners Office \(link is external\)](#), the UK data protection regulator.

Changes to this policy

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the Poole Communities Trust website or by contacting you directly.

Contact us

If you have any questions, comments or suggestions, please let us know by contacting us using the address above.