

PRIVACY NOTICE

The Mrs L D Rope Third Charity Settlement (**we, us or our**) respects your privacy and is committed to protecting your personal data. This privacy notice will provide you with information about how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how we collect and process your personal data, including any data you may provide through our application forms, when you contact us, or where we are providing you with goods or services.

It is important that you read this privacy 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 personal data. This privacy notice supplements those other notices and is not intended to override them.

1. The personal data we collect

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, date of birth, age, title and gender and information about dependents and family circumstances.
- **Contact Data** includes your home postal address and telephone numbers.
- **Financial Data** includes details of your weekly or monthly income and expenditure, any outstanding debts, whether you are a tenant or owner of a property and mortgage information and details of your residence and tax status.
- **Grant Data** includes details about payments to you, details of grants we have made to you or services or goods we have provided to you and details of other funding for which you may have applied from other agencies.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.

Personal data does not include data where your identity has been removed or which is not associated with or linked to your personal data (anonymous data).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Grant Data to calculate the percentage of applicants requesting a type of goods or services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Please note that 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 products or services that you request). In this case, we may have to cancel a service you have requested but we will notify you if this is the case at the time.

2. Special category data

Special categories of particularly sensitive personal data, such as information about your health, racial or ethnic origin or sexual orientation require higher levels of protection.

In general, we will not process special category data about you unless it is necessary for performing or exercising obligations or rights in connection with the products or services we provide to you.

In such cases, we will only process your sensitive personal data where you have consented for us to process such data (and when we request consent we will tell you the specific purpose for which it will be used). For example, we may process special category data to consider whether we need to make any appropriate adjustments in providing products or services to you.

3. Criminal convictions data

We will only collect information about criminal convictions if it is appropriate and where we are legally able to do so. We will only collect and otherwise process criminal convictions data in circumstances where you have consented for us to process such data. We will use information about criminal convictions and offences, for example we might need to assess suitability for a gym / leisure pass

4. How we collect personal data

We use different methods to collect data from and about you.

We may receive your personal data from direct interactions with you, which may include filling in forms or by corresponding with us by post, phone, email or otherwise.

Third parties such as social care agencies, support workers, front-line advice, the Charity Commission website, social media platforms such as LinkedIn or other organisations performing similar functions may pass us your Identity, Contact, Financial and Grant Data by filling in forms, corresponding with us by post, phone or email to assist you with applying for a grant or assistance. This includes personal data when a grant is applied for on your behalf or if you give us feedback or contact us in respect of the forms submitted on your behalf.

We may also collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at <https://www.theropetrust.org.uk/cookie-policy/> for further details.

We may also obtain personal data about you from public sources such as Companies House and the Electoral Register based in the UK.

5. The purposes for which we use personal data

We will only use your personal data when the law allows us to. We may collect and process the personal data about you for the following purposes:

- **Making grants** – we will use your Identity, Contact, Financial and Grant data to assess your application for a grant (financial/rental assistance) or for assessing future applications within a period of three years and for the purposes of providing any grant to you.
- **Delivering goods** – where we make a grant consisting of goods we will use your Identity and Contact data in order to procure the delivery of products and services to you, including the management of payments, fees and charges. This is necessary for the purpose of performing our contract with you.
- **Contacting us** - when you contact us with a query about how we use your personal information we will use your Identity and Contact Data to respond to you.
- **Administration** - we may use your Identity, Contact, Financial and Grant data for the purpose of administering and protecting our charity and ensuring it operates in a smooth and consistent manner. This is necessary for our legitimate interest in running the Charity, ensuring our security measures are adequate, to prevent fraud and in the context of a reorganisation or restructuring exercise, and for compliance with our legal obligations.

We may also use personal data which is passed to us by support workers, where the law allows us to do so, as follows:

- To deal with and/or respond to any enquiry or request prior to entering into any contract or agreement with us or as a result of such contract or agreement.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation, including the prevention of crime.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally we do not rely on consent as a legal basis for processing your personal data (other than special category data or criminal convictions data). If you do provide us with your consent, you have the right to withdraw consent but this may mean we will not be able to perform the contract we have or are trying to enter into with you.

Where we process personal data on the basis of a legitimate interest, as set out in this privacy notice, legitimate interest means the interest of our charity in conducting and managing our operations to enable us to give you the most valuable and secure service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

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. This may include removing you from our database where there has been no interaction between us over a prolonged period.

6. Disclosure of personal data to third parties

Your personal data will only be disclosed to those of our employees or workers that have a need for such access for the purpose for which it was collected. Your personal data will not be disclosed to any other individuals or other entities except in the following circumstances:

- On occasion, we need to hire other companies to help us to serve you better and in some of these cases we may need to share personal data that is necessary to perform tasks for us, such as where we engage third party suppliers to provide goods we are granting to you, for example for the purpose of ordering and delivering goods to you. These include but are not limited to: the Ipswich Furniture Project; Ipswich Borough Council; Kesgrave Carpets; Hughes Trade; Jennings Removals; British Heart Foundation Lowestoft, E B Carpets, Ryan Bloomfield flooring, Pete Matthews removals, Stour Valley Carpets and others that are deemed necessary in processing a grant award.
- Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract which may be entered into between us.
- Where we are under a legal duty to do so in order to comply with any legal obligation.
- In order to protect the rights, property or safety of our charity, our employees and workers, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.

We require all third parties that process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Security

We are committed to ensuring that your personal data 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 personal data we collect. In addition, the access to and use of the personal data that we collect is restricted to our employees, workers, trustees or support workers who need the personal data to perform a specific job role or activity. Where personal data is shared with third parties in line with this privacy notice responsible measures are used to protect your personal data. Any third parties 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.

The transmission of information to us by support workers via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data. However, once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

8. International transfers

We do not transfer personal data outside of the UK or European Economic Area.

9. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

For example:

- By law we have to keep basic information about our grantees (including Contact, Identity, Financial and Grant Data) for 7 years after we provide a grant for tax purposes.
- We will retain details of your grant application, including your personal data, for a period of 3 years to enable us to deal with any follow-up communications or repeat applications from you or to ensure that we are in possession of all relevant papers in the event of a legal claim relating to the contract between us.

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.

10. Your rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which

makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.

- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it but to restrict it instead; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of your above rights, please send a written request to us at the address listed at the end of this privacy notice.

You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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 any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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.

9. Changes to this privacy notice

We keep our privacy notice under regular review. This version was last updated on 24.11.2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

10. Contact Details

For further information on how your information is used, how we maintain the security of your information, your rights to access information we hold on you or if you wish to request that your data be deleted, our contact details are:

The Mrs L D Rope Third Charitable Settlement
Lucy House
St William Court
Kesgrave
Ipswich
IP5 2QP

Telephone: 01473 333288

Email: ropetrust@lucyhouse.org.uk

11. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.