

St Peter's Saltley Trust privacy policy

At St Peter's Saltley Trust we are committed to protecting and respecting your privacy. This Policy explains when and why we collect personal information about people who visit our website, how we use it and how we keep it secure.

In line with General Data Protection Regulations our core principles are that:

- We seek your permission to collect any of your personal data
- We store your data securely
- We do not use your data for any purpose other than that for which you have given us permission
- You are free to request that the personal data we hold on you can be deleted at any time (subject to any statutory regulations)

The basis on which we collect and use your personal data will be one of the following:

- **Legitimate interest** – for example, in order for us to decide to award a grant and administer it we need some information from you
- **To fulfil a contract** we have with you – for example, the supply of goods or services
- When you **consent** to it – for example if you sign up to receive our newsletters
- To fulfil a **legal obligation** – for example, sending our annual accounts to the Charity Commission, or for Inland Revenue purposes

We will keep this policy under review and may take the opportunity to enhance it from time to time, but if we make any significant changes that we think our customers or supporters would be interested in, we will endeavour to email them accordingly.

Any questions regarding this Policy and our privacy practices should be sent by email to director@saltleytrust.org.uk or by writing to us at: St Peter's Saltley Trust, Grays Court, 3 Nursery Road, Edgbaston, Birmingham B15 3JX. Alternatively, you can telephone us on 0121 437 6800.

Who are we?

St Peter's Saltley Trust is a registered charity committed to advance the Christian churches' work in education within the region covered by the Anglican dioceses of Birmingham, Coventry, Hereford, Lichfield and Worcester. The Trust offers funding and support to creative, innovative projects in three main areas:

- Christian learning, discipleship and theological education
- Strengthening the churches' work with the further education sector
- Religious education in schools

The Trust works on a completely ecumenical basis. More information on what we do and don't fund can be found on our website at www.saltleytrust.org.uk/support/

How do we collect information from you?

We obtain information about you when you use our website, write to us by post, give us any details at events or exhibitions, or contact us by phone. For example, this happens when you book onto one of our events, purchase a product, register to receive one of our resources or publications, or contact us about making an application, or about one of our products.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what webpages are accessed and when. If you are a project applicant, recipient of project funding or regular collaborator with the Trust, we may hold your name, address, phone number(s) and email address. If you purchase a product from us online, your card information is not held by us but is collected by our third party payment processors Paypal, who specialise in the secure online capture and processing of credit/debit card transactions. If you contact us direct to purchase a publication or book for an event, we will invoice you and do not collect card of bank details.

How is your information used?

We may use your information to:

- process orders that you have submitted;
- send you communications that you have requested and additional communications that may be of interest to you (these may include information about our events, products and ways in which you can help us practically and financially);
- carry out our obligations arising from any contracts or funding relationships entered into by you and us;
- to identify if there is mutual benefit in our director or trustees contacting you;
- notify you of changes to our services;
- seek your views or comments on the charitable activities and services we provide;
- process a grant or job application.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example for accounting or inland revenue purposes). We will only hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Applicants for Funding and Support

If you apply for funding from St Peter's Saltley Trust, your name, organisation, postcode and a brief description of your project will be shared with other Trusts within the Association of Church College Trusts (ACCT) via a password-protected shared database. This is collected for the following reasons:

- An ACCT member receiving an application for a grant or award may be aware of another member that may be able to provide a grant or award;
- To ensure that trusts can make award decisions in the light of other award decisions concerning an applicant;
- To support the statistical analysis of awards and grants made by ACCT members;
- To prevent fraud.

A data sharing and retention agreement for this database is currently being revised and should be published in late 2018.

If you have been successful in receiving a grant from St Peter's Saltley Trust, or collaborated with the Trust in a partnership project, we will keep an archive file related to the project, but remove personal contact details from the file after our standard retention period (see appendix).

We will also look to publish limited information about the grant and grantee on our website and in our newsletter. This is done specifically with the grantee's permission and include: title and description of grant, name of recipient, year awarded, and other information which you provide.

For payment of funds or grants your bank details are held securely and shared with TSB bank.

Recipients of our E-Newsletter

Recipients of our newsletter consent to providing first name, surname and email address to Mailchimp, who are the third-party provider we use to deliver our e-newsletters. Mailchimp are based in the United States and participates in, and has certified its compliance with EU-US Privacy Shield Framework. For more information, see Mailchimp's privacy policy. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletter.

Customers

Customers purchasing products via the shop facility of our website supply name, contact details and bank or credit/debit card details via our third party provider PayPal. We do not use this information for any other purpose.

Social Media

We use third party-providers Facebook and Twitter for our social media interactions. When you like or connect with us via social media your personal details are used only within the social media platform. We do not use them for any other purpose.

Trustees and Advisory Council members

We share the name of each Trustee on our Annual Report and Accounts and may from time to time mention Trustees in our communications. Trustees' names, addresses and dates of birth are published on the Charity Commission website. Personal contacts details are collected from Trustees and Advisory Council members with consent. We will not display or share contact details on Trustees without explicit consent. In order to pay expenses we share information with TSB Bank.

Suppliers

We contract the purchase of goods and services from suppliers. In doing so we have personal information such as names and email addresses of employees of the supplying organisation, and bank details. St Peter's Saltley Trust has a legitimate interest in maintaining contact with our suppliers in order to facilitate our core business and office functions. This information is for our internal use only, is shared with TSB bank and held securely on the invoice. It will only be shared with your explicit consent.

Consultants

We contract the services of consultants and writers on an occasional basis, to provide services to St Peter's Saltley Trust. With consent, we display the name of some consultants, with a photograph and brief biography on our website. In order to pay you we share information with TSB Bank. St Peter's Saltley Trust has a legitimate interest in doing this so that our beneficiaries can know which people provide services on our behalf, and so that we can respond to their invoices efficiently.

Job Applicants

When you apply for a job at St Peter's Saltley Trust you provide personal information in relation to the advertised job. Any personal information that is provided on the application is used for the legitimate interest of reviewing your application. This information is for our internal use only and will only be shared with your explicit consent.

Employees and Pensioners

With your consent, we display the name of each employee, a photograph and a brief biography on our website. In order to fulfil our legal obligation we share information with HMRC. Personal details including bank details are held securely within our retention period.

Who has access to your information?

We will not sell, rent or give your information to third parties, and we will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf:

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process interview transcription, send you mailings, or undertake our recruitment process). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about our activities then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information. However, you can change your mind at any time by contacting us by email on director@saltleytrust.org.uk or by telephone on 0121 427 6800.

How you can access and update your information

The accuracy of your information is important to us. If you change email address, or if any of the other information we hold is inaccurate or out of date, please email us on director@saltleytrust.org.uk or write to us at: St Peter's Saltley Trust, Grays Court, 3 Nursery Road, Edgbaston, Birmingham B15 3JX. Alternatively, you can telephone us on 0121 427 6800.

You have the right to ask for a copy of the information St Peter's Saltley Trust holds about you. If you wish to access this information please contact us in writing.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information you enter on the St Peter's Saltley Trust website (such as credit/debit card details) is handled securely by third party providers (currently Mailchimp for our e-newsletter, and PayPal for purchases made via our website). When you are on a secure page, a lock icon will be displayed by most web browsers. Email and electronic documents containing personal information are stored on password-protected computers and encrypted memory sticks/external hard drives. Project files and financial details are stored in locked filing cabinets.

Use of 'cookies'

When someone visits our website, we use a third-party service, Wordpress, to collect information about the use of the website – for example, how many pages people visit, what browsers and operating systems they use, how long spent on each page. The information is anonymous and is only used to help improve the site. The information is stored by Wordpress according to their own privacy policy.

Cookies are small files that are placed on your computer by websites that you visit. They are used to allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites run by different organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We are not responsible for the privacy policies and practices of other sites even if you access them using links from our website.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Review of this Policy

We keep this Policy under regular review. This Policy applies from 25 May 2018, and was last updated in May 2018.

St Peter's Saltley Trust, Grays Court, 3 Nursery Road, Edgbaston, Birmingham B15 3JX. Registered charity number 528915.

Appendix: Data Retention Policy

Personal Data Subject	Data Retention Period	Archive
Individuals and Organisations Applying for a Grant or partnering with us on a project	Successful applicants/project partnerships: Personal contact information kept for 3 years after the end of the grant/project Unsuccessful applicants: personal contact information kept for 1 year after application	Successful applicants/project partnerships: Indefinitely Unsuccessful applicants: 5 years
Newsletters	Under control of Mailchimp	
Social Media	Under control of Facebook and Twitter	
Website	Under control of Wordpress; financial transactions under control of Paypal	
Trustees and Advisory Council members	Personal contact details are retained for up to 3 years from end of date of Trusteeship/AC membership.	Names of Trustees/AC members are retained indefinitely as part of minutes of meetings and other associated papers
Suppliers	Suppliers' invoices are retained for 7 years	
Consultants	7 years following end of contract	10 years following end of contract
Job Applicants	6 months, unless applicant requests for their details to be kept on file	None
Employees	Personal details are stored for 3 years following end of employment	10 years following end of employment
Emails	10 years	Indefinitely