

# The Adnams Community Trust Privacy Policy

The Adnams Community Trust, a charity registered with the Charity Commission for England and Wales with charity number 1000203, is committed to protecting your personal data in accordance with the UK General Data Protection Regulation. This Privacy Notice explains how we collect, process, use and store personal data and your rights in relation to your personal data.

#### Information we collect

We may collect and process the following data about you:

- Your name and where you work or what organisation you are representing
- Your contact details including your email address, home address, business address and telephone number(s)
- Records of any correspondence you may have with us
- Your/your organisation's bank details
- Details of your shareholding in Adnams plc including the number and type of shares you hold, dividend payments you receive and your shareholder identification number
- Records of any donations you have made to the Adnams Community Trust

### How we collect personal data

Most of the personal information we collect is received directly from you through the Adnams Community Trust Application Form, Gift Aid forms or received directly from you in correspondence. We may also receive information from Link Group in relation to shareholders of Adnams plc who elect to donate their dividends to us or TotalGiving when donations are made through the TotalGiving onlinegiving platform.

#### What we use the personal data for

We use the personal data you provide:

- For the purpose of assessing your grant application
- To enable us to process and monitor grants once they have been awarded
- To detect grant fraud
- To process your donations
- To recover gift aid from HMRC
- To maintain accurate financial records
- To notify you of our activities and/or to keep you informed about our work but only where we have your consent to do so or the law allows us to contact you without consent.

#### With whom do we share your personal data?

We may share your personal information with trusted third parties where necessary for the effective operation of our charity for example:

- Adnams plc who provides us with administrative, financial and legal assistance
- The company which securely hosts our off-site cloud storage servers
- Other funders, trust and foundations, and related interest groups to assist us in assessing your grant application or detecting grant fraud
- HMRC and other government bodies to claim gift aid and meet our legal obligations
- Banks to process payments

We will not sell your information to third parties and will not share your information with third parties for marketing purposes.

### Where do we store your personal data and what happens if your data is transferred internationally?

Where we provide personal data to third parties, many of them are based in countries which provide an adequate level of protection such as the UK and the European Economic Area. When we need to transfer your personal data to a trusted third party based in a country where data protection laws are not considered to offer the same level of protection, we ensure adequate data protection safeguards such as using the Standard Contractual Clauses authorised by the ICO.

#### What are your rights?

You have the right to view personal information we hold about you. You have the right to request any amendments or rectifications to your personal data and/or to the deletion of your data or, in certain circumstances, to request the manner in which we process your data is restricted (for example you have the right to request that we do not use your data for marketing purposes). Please note in certain circumstances we may not be able to delete or erase your personal data such as where this is still required for the purpose for which it was provided or where we have overriding legitimate interests in retaining your data. To exercise these rights please send an email to <a href="mailto:communitytrust@adnams.co.uk">communitytrust@adnams.co.uk</a>.

#### How long will we keep your personal data for?

We will only retain your personal information 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.

### Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

## Complaints

If you are unhappy with the way in which we have collected or processed your personal data or have any other complaint in relation to our handling of your personal data, you can make a complaint to the Information Commissioner. Further information can be found on the Information Commissioner's website at www.ico.org.uk or via their helpline on 0303 123 1113.

#### How can you contact us?

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us by email at <a href="mailto:communitytrust@adnams.co.uk">communitytrust@adnams.co.uk</a>