



Data Protection Policy

Appendix 1: Privacy Notice

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Version 3

If this information is too long or hard to understand, you can contact us by email to info@theprouddtrust.org or by telephone on 0161 660 3347 and we can explain this to you face-to-face or over the telephone.

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1. Introduction

This privacy notice explains how The Proud Trust (“we”, “us” or “our”) handle any personal information about you. The Proud Trust is a company limited by guarantee, registered in England under company number 05585290 and charity number 1161102. Details on how to contact us are in Section 10 below.

The Proud Trust is committed to protecting your personal information and being transparent about what information we hold, whether you are a young person, donor, volunteer, training participant or you connect to us in another way.

The purpose of this policy is to give you a clear explanation about how The Proud Trust collects and uses the personal information you provide to us, whether online, via phone, email, in letters, in any other correspondence or from third parties.

We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What personal information The Proud Trust may collect about you
- How we might use that information
- Our legal basis for contacting you and using your personal information
- How we protect the privacy of children and vulnerable people
- Whether we disclose your details to anyone else
- Your rights and choices regarding personal information you provide to us

2. When do we collect personal information?

We may collect personal information about you when you:

- Ask about our activities, resources or training
- Register with us for information
- Use our services, attend our activities or groups, or access our premises
- Sign up for publications or newsletters
- Become a Trustee
- Volunteer or fundraise for us
- Pledge or make a donation or sign up for an event
- Purchase resources from us including through our online shop
- Telephone, write, contact us online, text us, or otherwise provide us with your personal information.

We may collect information about you directly whenever you interact with us. We may also receive information about you when you interact with third parties with whom we work. For example, where you’ve made a donation to us through a third-party website (e.g. Just Giving) and given them permission to share your information with us.

We may supplement what we know about you with information that is available to the public; for example, in order to ensure that our communication with you is relevant and tailored to you.

3. Why do we collect this information?

The main purposes for which we use your personal information are:

- To enable us to carry out the work of The Proud Trust as specified in our Memorandum and Articles (also known as our constitution).;
- Fundraising and promoting the interests of The Proud Trust;
- Creating materials for stakeholders (such as trustees, donors and partner agencies) about The Proud Trust's activities;
- For legal and regulatory compliance purposes, for example, to ensure compliance with safeguarding, health and safety requirements and other legal obligations, or in connection with litigation, an internal investigation or audit, and to ensure compliance with laws, as well as equal opportunities monitoring;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To inform individuals of news, events, activities or services running at The Proud Trust and partner organisations;
- For administrative purposes (for example, we may contact you regarding an event for which you have registered, to provide information requested from us or with a query regarding a donation you may have made to us);
- To carry out any contractual obligations we may have to you such as fulfilment of an order through the online shop;
- To process donations we may receive from you;
- For internal record keeping relating to any donations, feedback, or complaints;
- To contact you where you have been identified as a contact person for an organisation with whom we do or may work (if we obtain your contact details in this way, we will only use them to contact you in your capacity as a representative of that organisation);
- For our 'legitimate business interest', which means a reasonable use in line with what the aims and activities of The Proud Trust are;
- For safeguarding you or others.

4. What information do we collect?

Personal information we collect can include information such as your name, communication preferences, email address, postal address, telephone number, mobile number, date of birth, IP address (where necessary e.g. for our Help-services to pass on to emergency services in the event of an emergency) and, where relevant, bank account details so we can process donations or payments and information as to whether you are a taxpayer to help us to claim gift aid or for the purposes of paying staff. We may also collect and record any other relevant information you share with us about yourself, for example your employer if you are a volunteer or school/college if you attend one of our groups.

We may also collect and process information about your interactions with us, including details about our contacts with you for example through email on the phone or in person (such as the date, time, and method of contact), details about events or activities that you register for or attend and any other support you provide to us. Under data protection law, certain categories of personal

information are recognised as sensitive, including information regarding race, religious beliefs sexuality, gender, health information, whether you are looked after through the local authority ('in care'), or other characteristics relevant to the purpose for which we hold your data e.g. safeguarding. In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or support to enable you to participate in an event or group.

With your consent, we might also gather from you and hold case studies or stories of you and your life/ work with us, e.g. through films/videos for social media or through written case studies. This is usually for reporting to funders or for promotional purposes.

We do not collect sensitive personal information about our supporters unless there is a clear reason for doing so, for example, relating to your health if you are visiting a youth group or taking part in a challenge event to raise funds for us. We will only collect sensitive personal data with your consent, and clear notices will be provided on applications for events and other relevant forms and communications, so you know what information we need and why we need it.

In some cases, such as for potential donors, we may also collect information about you from publicly available sources.

We keep your personal information only for as long as required to carry out the functions of The Proud Trust in accordance with legal requirements, as well as tax and accounting rules. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

5. When do we collect personal information?

Generally, our processing of your personal information as described in this policy is allowed by applicable data privacy laws because we have a legitimate need to carry out the processing for the purposes described above. Some processing may also be necessary so that we can perform a contract with you (e.g. if you order items from our online shop) or because it is required by law. We only use your information to send you marketing communications by email or text with your consent, and you can always opt out of receipt of marketing communications by post or telephone as explained below.

When you sign up to a newsletter or opt-in to our communications using our forms (e.g. a registration form, donation form or online form) or in person, then you are giving us your consent to send you information, marketing and fundraising materials by the methods you have chosen, (e.g. email or phone call). We will never send you marketing by email or SMS without your consent, and you can withdraw your consent at any time.

We will always take care when contacting those who access our services to ensure that we do not 'out' someone's LGBT+ status to third parties or leave you at risk of being outed. For example, we may provide consent forms that do not have the charity's name on it.

If you have provided us with your postal or telephone contact details, but haven't specifically opted-in to receive our communications (for example, when making a donation by post), then we will carry out an assessment of whether it would be fair and reasonable to use your details to send marketing and fundraising information to you without your explicit consent, (i.e. it is in the interests of our aims as a charity and will not cause undue prejudice to you). This is called a "legitimate interests assessment".

In all cases, we balance our legitimate interests against your rights as an individual, and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Policy, and that does not intrude on your privacy or previously expressed marketing preferences.

If certain levels of donation are made, the Fundraising Regulator's Code of Fundraising Practice requires us, and all charities in the UK, to perform checks. If such donations are made to us, then we will seek advice from the Fundraising Regulator or a specialist third party. More details on this can be found at www.fundraisingregulator.org.uk.

You can opt out of our marketing and fundraising communications at any time, (e.g. through clicking on 'unsubscribe' when you receive our online bulletin or by contacting info@theproudtrust.org).

You can opt out of your data being used for profiling and wealth screening techniques by contacting info@theproudtrust.org.

6. Children and Vulnerable People

We place great importance on the safety of people we work and interact with and we are committed to protecting the privacy of young people interact with the Proud Trust.

For more information about the ways we safeguard people, you can request a copy of our Safeguarding Policy by emailing info@theproudtrust.org

Our activities and fundraising events may request specific information about the age of participants. Where appropriate we will seek the consent from a parent, guardian or carer before collecting personal information about young people under 18.

We will also always endeavour to put information in plain English in documents for children and young people, and wherever we have face-to-face interactions with young people and children, we will encourage them to think about their rights, and the consequences of sharing their data. This includes youth work sessions where we run themed activities to explore this e.g. during cyber safety sessions.

7. How we might use your information if you are a supporter

Developing a better understanding of our supporters through their personal data allows us to fundraise more efficiently, which ultimately helps us support LGBT+ young people.

We may use your information to invite you to become involved with us in new ways, raise funds and grow our supporter base. Marketing and fundraising materials that we might share with you include information about our activities and their impact, our news, events and fundraising appeals, and other ways you can become involved with us.

We have a duty to make sure that we're spending your donations wisely, and that means doing some research and analysis to inform our decisions. We want to send the most effective messages that we can in the most efficient way possible.

In order to work out who to contact, what to say and when to get in touch, we may undertake in-house research and engage third party organisations such as fundraising agencies to help us identify people who may be able to support us with a larger gift; using publicly available records.

We may also collect information on your interests, for example board memberships, hobbies, or articles about you in the media. We use this information to tailor our communication with you and invite potential supporters to meetings, groups and events which may be of interest to them.

9. Your debit and credit card information

We do not collect payment or other banking information from you directly apart from in limited scenarios, i.e. if you are a volunteer and we need to pay you expenses, or if you are an employee, for payroll purposes.

If you use your credit or debit card to donate to us, buy something or pay for a registration online or over the phone, those payments are currently processed by secure third party websites, such as Stripe or PayPal. We also have a card machine through a third party for in-person transactions.

In each case, we do not receive full credit or debit card details following the completion of your transaction. Please review the Privacy Policy of each provider should you wish to know how they manage your personal information. Or contact us for more details (contact details below).

If we receive an email containing any credit or debit card details, it will be immediately deleted, no payment will be taken and you will be notified about this. All purchases or donations should be completed through the online pages above or by post or in person at the LGBT+ Centre.

10. Your rights and choices

This sections gives more detail about the following rights related to your personal information:

- The right to request that inaccuracies be corrected
- The right to request a copy of personal information held about you

- The right to request us to stop processing your personal data
- The right to withdraw consent
- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

You can help us keep our records up-to-date by telling us when your contact details or other personal information changes. You can also change your mind at any time about how we contact you or ask us to stop contacting you altogether. Where you have provided your consent for our use of your personal information, you have a right to withdraw your consent at any time. Please contact us on info@theprouddtrust.org to request this, or use the postal address below.

It is important to be aware that some information you have given us will be in the public domain if you have consented to this, e.g. if you participate in promotional activity, filming or if you feature in our marketing materials. This may mean that it may not be possible to withdraw this material from circulation, so please think carefully about the consequences of consenting to your information being used in this way, before signing any release forms with us.

You have a right to request a copy of the personal information we hold about you, and to have any inaccuracies corrected.

You also have the right to request us to erase your personal information, request us to restrict our processing of your personal information or to object to our processing of your personal information.

We will comply with our legal obligations in relation to such requests, but please be aware that some information may need to be retained by us for legal reasons, for example if there is ongoing litigation or a reasonable prospect of law enforcement action.

Should you wish to exercise the above rights, please provide as much information as possible about the nature of your contact with us, to help us locate your records, including 'nicknames'/aliases that you might have been known by, and details of in what ways you have had contact with us. We may request confirmation of your identity before we release the information if we reasonably believe this is necessary to safeguard the personal information. In certain situations, we may also charge a small fee.

Please address requests to info@theprouddtrust.org with the subject line "Data Access Request", or send a postal inquiry to:

The Proud Trust Ltd
49-51 Sidney Street
Manchester
M1 7HB

If you have concerns about the way in which we have handled your personal information, we ask that you contact us in the first instance by post or email (to the addresses above).

If you are still dissatisfied, you have the right to complain to the Information Commissioner's Office (www.ico.org.uk) which oversees the protection of personal data in the UK, or the Fundraising Regulator (www.fundraisingregulator.org.uk), which is responsible for overseeing fundraising activities carried out by charities in the UK. Alternatively, you may choose to contact either the Information Commissioner or the Fundraising Regulator directly about your complaint, regardless of whether you have raised it with us first.

11. How do we protect your personal information?

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk.

12. Sharing your personal information

We promise to make all reasonable efforts to keep your details secure. We will only share them with suppliers or professionals working on our behalf, or on a need to know basis for legal reasons e.g. safeguarding concerns. We carefully select suppliers and professionals and will only share information with them if we are confident that they will protect it, and we have an agreement in place with them that assures this.

We will only ever share your details with other organisations to use for their own purposes if:

- We are required to by law or by a regulator;
- We deem it necessary and appropriate to respond to a legitimate request of assistance from law enforcement agencies;
- We are seeking legal or financial advice e.g. in connection with litigation or suspected fraud;
- We deem it necessary, in order to ensure the safety of a user on the digital help services (see Confidential connection statement)
- Where appropriate, to enforce the rights of The Proud Trust and its volunteers and employees;
- to our underwriters so that we can maintain appropriate insurance coverage.

We will not, under any circumstances, share with or sell your personal information to any third party for marketing purposes, and you will not receive offers from other companies or organisations as a result of giving your details to us.

Where you have given consent to do so, we may disclose your personal information:

- to any stakeholders such as funders, donors, volunteers, other participants as described in this release;
- to members of the press for reporting purposes;

- to the general public where we use materials for promotional purposes.

We may also share your personal information where you ask us to, for example where we make a referral to another agency.

13. Where personal information is stored

Your personal information may be transferred to, and stored at, a destination outside Europe in countries which have less strict, or no data protection laws, when compared to those in Europe. In these cases, we will take appropriate steps to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely. You can contact us for information of the applicable safeguards.

We store our data in line with our data protection policy, using secure physical safeguards (e.g. in locked filing cabinets in lockable offices) and secure IT systems, (e.g. password protected computers and systems).

14. Changes to this privacy policy

We may update the terms of this policy at any time, so please do check it from time-to-time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us, by placing a prominent notice on our website, and through arrangements in our face-to-face services. By continuing to use our website or services, you will be deemed to have accepted such changes.

the PROUD TRUST
home of LGBT+ youth | theproudtrust.org
FIND US ON FACEBOOK | @THEPROUDTRUST | 0161 6603347
Charity number 1161102