

## Privacy Schedule for Governance Participants and Local Stakeholders

This schedule sets out the details of our processing of personal information of our governance participants including national and local governance participants such as Trustees, members of Council and Regional Advisory Board and National Advisory Group members and other national and local user group members as well as local stakeholders such as members of the public who interact with the Trust at all levels to express an interest in the work of the Trust or for advice, feedback, complaint and comment.

It is important that you read this section of our privacy schedule together with the main section of our [privacy policy](#). This is so that you are fully aware of how your information is used and your individual rights.

### What Information We Collect About You

Depending on the circumstances and your exact governance role or relationship with the Trust, we may hold and process some or all of the following about you:

- Your name, date of birth and gender
- Your address and contact details, including email address and telephone number
- Your photograph and video or online recordings of your participation in Trust events (or third-party events where you are present on behalf of the Trust)
- Identity documents (including copy of passport and proof of recent address)
- Biographical details of your qualifications, skills, experience and employment history (including start and end dates) with previous employers and with the Trust
- Information regarding your other interests (including paid and unpaid positions held with other organisations)
- Data you make publicly available e.g., social media, and data made publicly available about you (such as company directorships, trusteeships)
- Information to support our work with high net worth individuals, to understand their philanthropic interests.
- Expenses details (including travel and accommodation whilst attending Trust related events and meetings)
- How you would like to hear from us
- Your bank account details
- Details on any unspent convictions
- If you have previously been declared bankrupt, are an undischarged bankrupt, disqualifies from holding office as a Trustee or director
- Information relating to HMRC's fit and proper persons checks (Trustees only)
- Your attendance at Trust related events
- Your area of interest in the Trust's work
- Information relating to accidents or incidents

## How We Use Your Information

Your personal data may be collected in a variety of ways. For example, for Governance participants, through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed and biographical information and photograph supplied by you at the start of or during your period of involvement with the Trust; from correspondence with you; or through interviews or meetings or events.

We may take photographs of governance participants during attendance at Trust related events and meetings.

Personal data may also be collected about governance participants from third parties, such as references supplied by former employers and information from criminal records checks where appropriate for the role.

We also collect data on our governance stakeholders whose philanthropic aims align with those of the Trust and/or our current fundraising campaigns. We undertake in-house research and from time to time engage specialist agencies to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, high net worth individuals, social networks such as LinkedIn, political and property registers and news archives.

We may also carry out research using information in the public domain to identify individuals who may have an affinity to our cause but with whom we are not already in touch. This enables us to understand the background and interests of a prospect, inform our funding strategy and target our communications more effectively,

We carry out analysis on our governance stakeholders, to determine the success of our communications and to better understand supporter behaviour, patterns and trends. We do this by assessing various types of information including donation behaviour (amounts and frequency) or geo-demographic information (for example, age and location). This analysis helps inform and improve our marketing and fundraising practices and to ensure we deploy resources as effectively and as timely as possible, for example, contacting supporters with appropriate information and requests by reducing the amount of irrelevant communications being delivered to enhance supporter experience.

To help us market and fundraise more efficiently, we may collect information about you that gives us insight into the likelihood of you wishing to support our work. Such information is compiled (either by us or by a contracted third party) by way of non-intrusive profiling using only publicly available information about you such as your location. This helps us to understand the background of our supporters so that we can make appropriate requests to those who are willing to support us. We may also compile information (either by us or by a contracted third party) from publicly available sources on prospective supporters including high net worth individuals. This enables us to understand the background and interests of a prospect so we can tailor our communication accordingly.

We may aggregate and anonymise personal data so that it can no longer be linked to any particular individual. This information can be used for several purposes – for example, to identify common characteristics amongst our existing supporter base, helping us to better understand our audience and to make our communications as efficient as possible.

For those individuals who interact with the Trust in respect of an area of interest in the work of the Trust or for general advice, feedback, complaints and other comment, we will collect your name and contact details as well as the substance of your area of interest, complaint or other communication.

There may be instances when in the course of maintaining or repairing a Trust asset we need to liaise with an organisation, individual or their appointed agent to gain access to a specific location. This is

necessary for the Trust to fulfil its legal obligations and in doing so restricted elements of personal data, such name and contact details, may be shared internally or with our framework contractors.

Personal data will be stored securely in a range of different places in the Trust's information management systems. Physical certified copies of Trustee identity documents will be kept in a secure location under the sole control of the Trust's Legal & Governance team.

If you are involved in a near miss or a health and safety incident on Trust property or whilst at work, we will collect data relating to you and the incident in order to investigate and improve our working practices and the areas we have open or accessible to the public, staff, or volunteers within the Trust.

## **Legal Basis for Processing Your Personal Information**

Some personal information is necessary for us to collect and process under our legal obligations. For example, we need to collect and retain certain information relating to our Trustees as they are also the legal directors of the Trust and we need to provide proof of identity and residential address of Trustees under money laundering regulations.

We ask for details of unspent convictions in relation to safeguarding children and vulnerable adults pursuant to our legal obligations in this area.

Other personal information is essential for us to collect, organise and share in order to identify and communicate with our governance participants in an effective and efficient manner and we see this processing as within our legitimate interest. We need your bank account details to reimburse expenses of governance participants. We also need to store your personal details on our on-line third-party travel and accommodation booking system (where your email address may be visible to other governance stakeholders when other search for their details which assists with the functionality and usability of the system).

We may also send group emails which show your email address to other relevant governance stakeholders, for the purposes of facilitating communication between those stakeholders.

We take photographs and sometimes take recordings of governance and other Trust related events, where your image and/or a recording of your participation may appear.

We see this as within our legitimate interest to process personal details of governance participants in this way.

When the Trust gathers information relating to health and safety near misses or incidents, we are relying on legal obligation for the collection of this data and the processing of it to investigate and improve our estates.

For other local stakeholders, we need to process this information so that we can resolve the query or complaint in question and follow up with those individuals that have contacted us and expressed an interest in the outcome. We also need to group our local stakeholders together in our information management systems in order to effectively organise our charitable resources and focus our efforts and communications in the most efficient way possible. We therefore rely on our legitimate interest in processing your personal data in these circumstances.

When gathering research and contacting governance stakeholders we rely on legitimate interest. We see our supporter analysis, aggregation and anonymisation and non-intrusive profiling as a balance of helping us fundraise more efficiently and our obtaining a greater understanding of our supporters and their interests is in favour of us carrying out this analysis and we are therefore relying on this as a legal

basis. Where we do this, we will always refer to our privacy policy to ensure you are aware of your rights in relation to your personal data.

## **How We Share This Data**

The name, email address, photograph, biographical detail and other interests of governance participants may be shared internally within the Trust and with other governance participants in the Trust.

Names, photographs and biographical information of governance participants may be put onto the Trust's website and used in digital and hard copy Trust and third-party materials used to promote the work of the Trust.

The Trust may share personal data of governance participants with third parties in order to obtain references from other organisations that you are involved with, and obtain necessary criminal records checks from the Disclosure and Barring Service.

We may share personal data of Trustees with third parties such as banks and other financial service providers required to perform customer due diligence under money laundering legislation. Where governance participants are involved in Trust projects with partner charities or societies then your information may be shared with them. We ensure that they only have access to data necessary for the project and that they process your data only in accordance with your data protection rights.

We may also share data of governance participants with some or all of the following third parties that process data on our behalf:

- External legal advisors, employer's insurance policy providers and loss adjustors
- External auditors and other consultants and research companies
- External wealth screening/prospect research companies
- Regulators (e.g. Companies House, Charity Commission)
- External service providers such as our electronic board packs provider

The details of individual stakeholders or organisations who have a vested interest in the work of the Trust in maintaining the wide range of assets owned and managed by the Trust will only be shared with individuals internal to the Trust or who are employed / volunteer to undertake work on our behalf.

**Last edited: May 2022**