The Listeners Trust

DATA PRIVACY NOTICE

1. **Your personal data – what is it?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. **Who are we?**

The Listeners Trust, a registered charity based in Southampton (hereafter referred to as "The Listeners") is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

3. **How do we process your personal data?**

The Listeners complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We use your personal data for the following purposes: -

- To enable us to receive applications for grants
- To inform you of updates regarding your application
- To enable us to give out grants
- To maintain our own accounts and records

4. **What is the legal basis for processing your personal data?**

- "Consent" is the basis for processing any personal data that is submitted to us via our online application form, and explicit consent is therefore be obtained from you in this case when you submit the form.
- In most other cases, the basis for processing your personal data is "Legitimate Interest". This means we may correspond with you based on legitimate interest, as you have contacted us, and have applied for a grant and have personally given us your contact details and personal data, either by post or email.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
    - The processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
    - There is no disclosure to a third party without consent.

5. **Sharing your personal data**

Your personal data will be treated as strictly confidential and will only be shared with others in The Listeners in order to carry out our aims. Specifically, your application form will be shared with the Trustees of the Listeners.

If your application is successful, we will subsequently and separately request bank details in order to make payment of the grant, and in this case, this data is shared with only those Trustees who make the payment, plus the bank itself. It is your responsibility to share these details with us securely.

We do not share your data with any other third parties outside the organisation without your permission.

6. How long do we keep your personal data?

We keep data in accordance with our The Listeners data retention policy. Specifically, we keep a record of all applications received by the Listeners for our own records as a registered charity. Bank data is retained whilst it is still current, and is deleted after use. Data is reviewed and deleted on an annual basis.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which The Listeners holds about you
- The right to request that The Listeners corrects any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for The Listeners to retain such data
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing

conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Publicity

We usually request successful grant applicants to provide us with a short paragraph about their project that can be shared on our website or social media. This does not usually contain any personal information, but it is the responsibility of the grant applicant to ensure that any information provided, including photographs, is suitable for this purpose.

10. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Listeners

- by email: contact@thelisteners.org.uk
- By post : The Listeners Trust, Allston, Allington Lane, Fair Oak, Eastleigh, SO50 7DE

You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

DATA RETENTION POLICY

To be read in conjunction with the Data Privacy Notice, above.

1. Data Protection Principles

The Listeners (the data controller) is committed to fulfilling its responsibilities under the GDPR in relation to its handling of personal data. The Listeners may collect, store, and process personal data in order to carry out the aims of the charity. Under the provision of GDPR, anyone handling personal data must comply with the following principles of good practice by ensuring that data is:

- Collected for specified, explicit and legitimate purposes by unambiguous forms requiring consent of data subjects in advance of collection - and not further processed in a manner that is incompatible with the stated purposes
- Processed fairly and lawfully in a transparent manner
- Adequate, relevant and limited to what is necessary in relation to the stated purpose for which they are used
- Accurate and kept up to date as required with regular checks
- Kept in a form which permits identification of data subjects for no longer than necessary for the purposes for which the personal data are processed
- Anonymised if appropriate
- Stored safely and securely
- Destroyed by trustees on leaving their role as trustee, or passed onto a current trustee

An individual (data subject) may request to see the data held about them, and has the right to withdraw consent for their data to be processed at any time, in which case, data processors must comply with such requests.

2. **What is the Listeners policy for storing, reviewing and deleting data?**

This policy applies to anyone who processes data (ie collects, stores, reviews, shares, uses or deletes data) on behalf of the Listeners. This includes all the Trustees of the charity.

2. What is the Listeners policy for storing, reviewing and deleting data?

a) Storing data

- Personal Data is stored securely on both paper and computer records.
- Paper records that include personal data are kept in a secure place (a filing cabinet or similar)
- Emails and computer documents containing personal data are to be kept on a secure computer, and not accessible to those other than the Trustee to whom they have been sent.

b) Reviewing and Deleting Data

- Data will be reviewed annually. Where the data is no longer relevant or required, the data should not be retained, unless permission has been given for a specific reason.

c) Good Practice regarding Emails

- We recommend that if Trustees need to retain email conversations, these should be archived on an annual basis.