



## Privacy Policy

How we respect privacy when we deal with personal information collected by our charity

*Version 3 dated 17 December 2020*

This Privacy Policy applies to information we (**SMART (Suffolk Music & Arts Alumni Trust)**) collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us at [admin@suffolksmart.org](mailto:admin@suffolksmart.org).

### 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purposes of processing	Categories of personal data (key elements)	Lawful basis for processing
Enquiring about SMART and its work	Personal and contact details, email message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our work	Personal and contact details	Consent - you have given your active consent.

Making a donation	Personal and contact details, financial information (Gift Aid)	Legitimate interests - this information is necessary for us to fulfill your intention of donating money, us obtaining Gift Aid, and your expectation of receiving a confirmation message.
Administering membership applications and communicating with members about SMART membership / SMART's work / SMART social and fundraising events	Personal and contact details, years with Suffolk Youth Music, membership records	Contract - by paying your membership fees you have entered into a contractual relationship with us and agree to abide by SMART's Constitution.  Consent - you have given your active consent.  Legitimate interests - this information is necessary for us to fulfill your expectations of membership of SMART.
Website functionality	Website activity collected through cookies to optimise website	Consent - you have given your active consent
Individual grant applicant - applying for funding from SMART and communications regarding application and subsequent funding	Special category data, date of birth	Special category data: Explicit consent - SMART will require applications to be anonymised before being submitted to the Trustees for consideration. Where you provide supporting evidence that contains special category data which cannot be anonymised, SMART needs you to give your active consent before SMART can receive and process this data.  Date of birth: Legitimate interests - this information is necessary for us to consider and administer your application for funding. This information will only be available to the Trustees administering the funding applications, and all applications will be anonymised before being submitted to the remaining Trustees for consideration
Organisation grant applicant / individual grant applicant's referee - applying for funding from SMART and communications regarding application and subsequent funding	Personal and contact details, financial information	Legitimate interests - this information is necessary for us to consider and administer your application for funding. This information will only be available to the Trustees administering the funding applications, and all applications will be anonymised before being submitted to the remaining Trustees for consideration
Nomination as a Trustee of SMART	Personal and contact details	Legitimate interests - this information is necessary for us to fulfill your intention of becoming a Trustee of SMART
Communications with Trustees	Personal and contact details	Legitimate interests - this information is necessary for us to carry out the work of SMART through the Trustees
Publishing member profiles on SMART's website	Website profile information, photo	Consent - you have given your active consent

Communicating with regional alumnus groups and coordinating get-togethers, support/friendship to those new to an area and arranging fundraising events	Personal and contact details	Consent - you have given your active consent
Publicity about SMART's work and fundraising events	Photos, videos of participation in SMART-related events	Consent - you have given your active consent

**Personal and contact details** may include: name, date of birth, email address, postal address, telephone or mobile number, social media contact details, regional area

**Membership records** may include information about start and end dates of membership

**Financial information** may include bank account and/or credit card details to process payments or administer funding grants, gift aid declaration

**Website profile information** may include information about your time with Suffolk Youth Music, the instrument(s) you play, your education and your career path and/or information about yourself and why you support SMART, and/or any personal website or social media page you want linked to your profile

**Special category data** may include information about race, ethnic origin, religion, health or other sensitive information, which applicants for funding may choose to disclose as being relevant to the reason they wish to seek funding.

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

## 3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

## 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

## 5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at [admin@suffolksmart.org](mailto:admin@suffolksmart.org)

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, improving security, identifying logged-in users, and counting the number of people looking at a website. Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect.

## 7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.