

## **VACT GDPR Privacy Notice**

### **WHAT IS THE PURPOSE OF THIS DOCUMENT?**

The Veronica Awdry Charitable Trust (“VACT”) is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. It makes you aware of how and why your personal data will be used, namely for the purposes of considering your application and advancing funds, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **DATA PROTECTION PRINCIPLES**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

In connection with your application for funds from us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, date of application, purpose of application, amount requested, own funding, total needed, date funds required, whether a previous application has been made, trustee decision as to whether to make a grant, agreed amount of grant, reason for declining a grant, referee contact details, references obtained, payee, cheque number (our personal use), whether we have received an update or thanks, whether the application was paper or electronic, where the application has been stored.

### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about candidates from the following sources:

- Your application form.
- Your referees when references are collected.

### **HOW WE WILL USE INFORMATION ABOUT YOU**

We will use the personal information we collect about you in the following ways:

- Electronic applications are filed electronically, hardcopy applications are scanned and filed.
- Details from the applications (both electronic and hardcopy) are transferred to the applications spreadsheet to be considered by the Trustees.

- The spreadsheet is circulated to all the trustees.
- The Trustees make a decision on whether to award the grant.
- The spreadsheet is updated to record the decision, amount of grant or reason for rejection.
- If the Trustees have decided to award a grant, this is subject to references. Your referee(s) are contacted and references obtained and those details are kept in electronic form.
- Grant cheques sent to the successful applicants using the address details provided.
- Thank you messages sent by successful applicants are recorded on the thank you schedule.
- The details of concluded applications are transferred to the “historic application spreadsheet” where the data is retained for 10 years.
- Data is destroyed after a period of 10 years.

### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully. For example, we require details of your application and how to contact you for our Trustees to consider your application and send out the funds requested.

### **DATA SHARING**

#### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: Wansbroughs Solicitors, Northgate House, Devizes SN10 1JX. If you are successfully awarded a grant then your name, grant such awarded and cheque payee details and cheque number will be shared with our accountant, Monahans of Fortescue House, Court Street, Trowbridge, Wiltshire BA14 8FA who prepare and audit the charity’s accounts.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **DATA RETENTION**

### **How long will you use my information for?**

We will retain your personal information for a period of 10 years after we have communicated to you the Trustees' decision. We retain your personal information for that period so that we can cross reference any application you may make to VACT for a grant in the future and to show that the Trustees have made decisions in approving grants in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our VACT GDPR Policy 2018.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you; this enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information; this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer ("DPO"), namely Anna Wensley Stock of Wansbroughs Solicitors, Northgate House, Devizes SN10 1JX in writing. We have prepared forms for the above which are readily available on our website, save for requests for transfer of personal information which must be submitted to the DPO in writing.

## **RIGHT TO WITHDRAW CONSENT**

You have the right to withdraw your consent for processing at any time. To withdraw your consent, please contact the DPO in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

## **DATA PROTECTION OFFICER**

We have appointed a DPO to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

## **COMPLAINTS PROCEDURE**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. However, you should raise any complaint with the DPO in writing in the first instance.