



## Privacy policy

The Chartered Secretaries' Charitable Trust ('the Trust') was incorporated on 9 July 2013. Registered charity no. 1152784. Company registration no. 8602517. The Trust:

- serves The Chartered Governance Institute UK & Ireland members, graduates, students, employees and their families to relieve and help prevent financial difficulties,
- facilitates research to increase good governance for the benefit of the public and
- encourages the expertise of those in the field of governance with bursaries and prizes.

This Privacy policy statement describes the ways in which the Trust use and disclose personal data. This includes information received from applicants for financial assistance, our volunteer visitors and supporters, our Trustees and Support and Grants Committee members and from third parties.

## Personal data

Personal data includes any information that identifies you personally, such as your name, address, email address or telephone number. The Trust respects the privacy of your personal information and complies with the Data Protection Act 2018 (DPA) and the Privacy and Electronic Communications Regulations. Our privacy notice that provides greater details for applicants for financial assistance, along with our Data protection policy is available on our website and on request.

## How personal data is obtained

The Trust processes personal information supplied to us in writing, via email, via the telephone, in person or online. This may be combined with information obtained from CGIUKI, our volunteer visitors, other charitable organisations, suppliers of bespoke services, our bank and online donation platforms.

## Purpose of using your data

The Trust processes personal information where you have given your consent, where there is a legitimate interest to do so to fulfil our charitable objectives or where it is necessary to comply with legal or contractual requirements. The lawful basis relied upon will depend on the nature of the activity. For example:

- Applications for financial support: necessary for the performance of a task carried out in the public interest and/or legitimate interests
- Donation processing and gift aid: compliance with legal obligations
- Communications and engagement: consent or legitimate interests

Applicants to the Trust for financial assistance are requested to provide information on their relationship to CGIUKI along with financial details of their household and health conditions of themselves or any dependents (where relevant to the enquiry). This information helps to ensure your eligibility for support and to inform the Trust of any additional financial needs.

**Special Category Data:** The Trust may process special category data, including information relating to health, where this is necessary to assess eligibility for support. This processing is carried out in accordance with Article 9 of the UK GDPR, including where it is necessary for reasons of substantial public interest or the provision of social support.

The Trust has a legitimate interest in retaining and using this personal data as appropriate, to ensure that assistance is only provided to those who have a relationship to CGIUKI and that they have a genuine financial hardship.

The Trust undertakes identity checks on all volunteer visitors and requires the successful completion of a Disclosure and Barring Service check prior to their commencement of visits to beneficiaries. For Trustee appointments, individuals are subject to additional checks with the Charity Commission, Companies House and the Individual Insolvency Register to ensure they are willing and eligible to take up the role.

For those individuals who kindly donate to our charity and are in a position to Gift Aid their donations we require them to provide their address, sign a Gift Aid declaration, the information on which will be shared with HMRC, and, if appropriate, provide their bank details to enable direct debit transactions to be set up.

In certain cases, we may reuse personal data for purposes which are compatible with the original purpose for which it was collected, including internal analysis, service improvement, and supporter engagement. Where we do so, we will ensure that appropriate safeguards are in place and that such use is fair, transparent and lawful.

## **Disclosure of information**

All data is treated as strictly confidential, is only used for the purposes it was originally collected for and is only disclosed to those parties who have a need to access it to fulfil the charitable objectives or where required to do so by law. Where the Trust relies on the individual's consent prior to sharing with the third party this consent can be withdrawn at any time.

- The Trust needs to disclose data to CGIUKI.

While the Trust controls the purposes, policies and processes of the data it obtains, records, uses and stores, the employees responsible for the day to day administration are employed by CGIUKI. CGIUKI also provide appropriate support through for example, their examinations, finance, IT and membership departments. CGIUKI is not permitted to use this information for any other purpose than to perform the processing service as instructed by the Trust.

- The Trust may disclose data to other third parties who provide services on behalf of the Trust such as, IT system providers, payment processors and professional advisers. Where third parties process data on behalf of the Trust, appropriate contractual arrangements are in place to ensure the security and confidentiality of personal data..

The Trust may offer a beneficiary a bespoke service, for example an emergency alarm system to frail beneficiaries so that they can reach for assistance in case of a fall. In these circumstances, information will be shared on a need to know basis in order to fulfil the bespoke service.

## **How long information is held**

The Trust will securely maintain records in line with our Data protection policy. As a general rule, data is held for a maximum of six years following the cessation of the Trust's relationship with the individual. Retention periods may vary depending on the nature of the relationship and legal or regulatory requirements. Further detail is set out in the Trust's Data Protection Policy. After this time, all paper and electronically held records are securely destroyed. Please see our full Data protection policy for details.

## Storage and security of personal data

To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, the Trust has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information collected and processed on behalf of the Trust.

## Cookies

Cookies are tiny files that store a small amount of data about your visit to a website and are a standard feature on many website. Cookies enable certain information about your visit to be saved on your browser, so you don't have to re-enter it when you visit the site again. Some cookies are essential for core functionality, meaning the website won't function properly without them. These cookies are enabled by default and cannot be disabled.

We use cookies to identify you when you visit our website, keep track of your browsing patterns, and build a demographic profile of our site users. This helps us continue to improve our website. Where cookies are not strictly necessary for the operation of the website, they will only be used with your consent.

For more information about the cookies we use, please [view our cookie policy](#).

### How do I change my cookie settings?

You can change your cookie preferences at any time by clicking on the 'C' icon. You can then adjust the available sliders to 'On' or 'Off'.

Most browsers allow you to turn off cookies. If you want to know how to do this, please check the menu on your browser or visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that turning off cookies will restrict your use of our website.

## Your rights

You have the right to be informed about the processing of your personal data, request access to the information held about you, request rectification of any information that is inaccurate, request deletion of information or restrict processing at any point. You also have the right to move, copy or transfer your personal data, object to the processing and rights in relation to automated decision making including profiling. Where processing is based on your consent, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing carried out before you withdraw consent.

To find out more, refer to the Information Commissioner's Office (ICO) website: <https://ico.org.uk>

If you have any questions regarding this statement or concerns, wish to exercise your rights, or have any concerns on the accuracy and use of your data, please contact the Charities Officer, (CSCT@cgi.org.uk), telephone: 020 7612 7049 who is responsible for the day-to-day administration of the Trust and for reporting any data breaches in respect of the Trust to the ICO and any serious incidents to the Charity Commission.

## **Right to complain**

If you believe we have not handled your personal data in accordance with data protection law, you have the right to complain to us.

Complaints relating to data protection will be handled in accordance with the Trust's Complaints and Comments Policy, and will be:

acknowledged promptly;

investigated proportionately; and

resolved within a reasonable timeframe.

Records of data protection complaints will be maintained and reviewed to support continuous improvement.

We will aim to acknowledge receipt of your complaint within five working days. At this stage, we may also ask you for further details in order to help us fully investigate the matter.

We will also aim to respond to your complaint in full within 20 working days. If we are unable to investigate the matter fully within this timeframe, we will contact you to explain why we need further time to respond.

## **Raising a data protection complaint**

You can raise a data protection complaint by:

- emailing us at [csct@cgi.org.uk](mailto:csct@cgi.org.uk)
- contacting us by phone 0207 612 7049
- or post to The Chartered Secretaries' Charitable Trust, Saffron House, 6-10 Kirby Street, London, EC1N 8TS

Please provide as much information as possible about the nature of your complaint and the outcome you are seeking.

## **Contacting the Information Commissioner's Office**

You also have the right to complain to the Information Commissioner's Office, which regulates data protection law in the UK. The ICO will usually expect you to have raised your concern with us first. You can find more information on the ICO's website at [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint).