

Milton Keynes Community Foundation Privacy Notice

This Privacy Notice sets out how Milton Keynes Community Foundation aims to repay the trust you have shown by sharing your personal data with the charity.

The Privacy Notice in brief

It's important that you read the full Privacy Notice to understand what information we hold, how we may use it, and what your rights are – but if you don't have time to read it all now, here is a short summary:

- We collect information that is either personal data (such as names, addresses, and telephone numbers) or non-personal data (such as your Internet Protocol (IP) address, web pages accessed etc.)
- We collect information about our supporters, donors, fundraisers, volunteers and employees.
- We collect information to provide services or goods, to provide information, to fundraise, for administration, to assess and award grants, research, profiling, analysis, and for the prevention/detection of crime.
- We only collect the information that we need, or that would be useful to us in our aim to provide the best possible service.
- We do our very best to keep personal information secure, wherever we collect personal data online.
- We never sell your data, and we will never share it with another company or charity for marketing purposes.
- We only share data where we are required by law, or with carefully selected trusted suppliers who do work for us. All our suppliers are required by their contract to treat your data as carefully as we would, to only use it as instructed, and to allow us to check that they do this.
- Our websites use cookies – for more information check <https://www.mkcommunityfoundation.co.uk/cookies-policy/>

These are the basics but don't forget to come back later and read the full privacy notice (below), so you have all the details you need.

Milton Keynes Community Foundation Privacy Notice

Milton Keynes Community Foundation promises to respect the personal information you provide to us. We wouldn't want to use it in a way that you won't expect, so our Privacy Notice explains how we protect your privacy and how you can control how we use your personal information.

If you want to change the way in which we use your data or if you have a question about how your personal information is used, please contact us using any of the methods below:

Email: info@mkcommunityfoundation.co.uk

Phone: +01908 690276

Monday to Thursday 8:30am to 17:00

Friday 8:30 to 16:30

Postal address: MK Community Foundation, Acorn House, 381 Midsummer Boulevard, Central Milton Keynes, MK9 3HP.

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Who we are:

In this privacy notice, whenever you see the words 'we', 'us' or 'our', it refers to

- The charity **Milton Keynes Community Foundation** - Registered Charity number 295107
- The company **Milton Keynes Community Foundation Limited** - Company number 2032715
- The company **MK Community Properties Limited** - Company number 02650530

MK Community Properties Limited, is a provider of meeting and conference facilities. In addition, the company also leases Small Business Units on licence to both commercial and not for profit organisations. Its aim is to support the Voluntary Sector in Milton Keynes, either through subsidised meeting and conference room hire or indirectly through its surplus income from commercial Small Business Units, which contributes towards the Community Foundation's grant making programme. All of its profits are passed to Milton Keynes Community Foundation Charity.

How we use your personal information

We appreciate you have provided us your personal information and will respect the trust that this represents. There will be times when we will need to use and share your personal data. The law says that we must use one of the following reasons to do so:

- **Contract** – your personal information is processed in order to fulfil a contractual or potential contractual arrangement.
- **Consent** – where you agree to us using your information e.g. to receive certain digital information from us.
- **Legitimate interest** – where we use your data in a way that we believe you would expect us to because of our relationship e.g. to monitor and improve our services. In each case where we use your data based on our legitimate interests, we carefully balance your rights and expectations to ensure that processing is fair to you.
- **Legal obligation** – where there is a statutory or other legal requirement to process and share the information e.g. gift aid returns.

Here is a list of the ways that we may use your personal information, and which of the reasons described above we rely on to do so.

Where we list legitimate interest as a reason, we also describe below what we believe these legitimate interests are:

Our processing about you if you are a supporter or donor:

Handling the administration of your gift or donation when received by cash, cheque, credit/debit card, direct debit, standing order and charity vouchers or our online fundraising partners. Our lawful basis is contractual.

Administer Gift Aid and Gift Aid declaration forms. Our lawful basis is a legal obligation.

Keep you informed of upcoming initiatives, campaigns and events. Our lawful basis is a legitimate interest to generate funds to support and facilitate our mission.

Assess your ability for gift giving. Our lawful basis is a legitimate interest to generate funds to support and facilitate our mission.

To keep a record of your relationship with us. Our lawful basis is a legitimate interest to generate funds to support and facilitate our mission, campaigning and provision of appropriate services.

Conduct due diligence and ethical screening. Our lawful basis is a legitimate interest to ensure that individuals who we develop relationships with are of good character and ethics.

Providing you with information and requests on issues that are important to people with an interest in the development and growth of Milton Keynes. Our lawful basis is a legitimate interest/consent to improve supporter interactions

Managing and monitoring personal, contractual, performance and financial information. Our lawful basis is contractual.

To improve our website and the range of services and products we provide. Our lawful basis is consent* (cookies) and legitimate interests (other) in improving our offering.

Understand your perspective and requirements through surveys for you to participate in. Our lawful basis is legitimate interests in improving our offering.

Contact you with appropriate marketing messages. Our lawful basis is consent (When we process any of your information on the basis of your consent you may withdraw this consent at any point) (electronic marketing) and legitimate interests (other marketing) in direct marketing.

To detect, investigate and report a financial crime (eg fraud). Our lawful basis is legal obligations / legitimate interest in efficient and effective use of donated funds.

Maintaining network and data security. Our lawful basis is legitimate interest in ensuring the safety and confidentiality of your information.

Responding to your comments or complaints. Our lawful basis is legitimate interest in efficient and effective management of our relationship.

CCTV footage on premises. Our lawful basis is legitimate interests to protect the security of our assets and people.

Our processing about you if you are a volunteer, employee, contractor or applicant:

Assess your application for an employment or volunteering position. Our lawful basis is contractual (staff) and legitimate interest (volunteers) in efficient and effective processing of your application.

Managing personal records and financial information of volunteers including expenses, emergency contacts. Our lawful basis is legitimate interest in efficient and effective management of our relationship.

Managing personal records and financial information of staff including payroll, PAYE, leave and other terms and benefits associated with contract of employment. Our lawful basis is contractual.

Safeguard our members, volunteers, staff and service recipient. Our lawful basis is legitimate interests and legal obligation to safeguarding.

To pass your details when required over to the Health and Safety Executive (HSE), and where appropriate our insurers and our solicitors should you be involved in an accident or incident while on our premises or when taking part in one of our events or activities. Our lawful basis is lawful obligation (HSE) and legitimate interests in facilitation of our legal interests.

* When we process any of your information on the basis of your consent you may withdraw this consent at any point.

You can easily withdraw the permissions you have given us, at any time either by using our contact details in this policy or by using the methods we tell you about in our communications e.g. using the 'unsubscribe' link on our emails.

What personal information we hold about you?

We only ask you to supply information that we need in order to provide the service you have requested. We will normally ask you to provide us with:

- Your name
- Your contact details

But we may request other information where it's appropriate and relevant, for example:

- Your bank details
- Your reasons for supporting the Milton Keynes Community Foundation, i.e. if you or a family member have invested in one of our grant making funds
- Your profession
- How you would like us to contact you
- Age or date of birth, where relevant to your participation in an event or activity
- Accessibility or medical information where relevant to your participation in an event or activity
- Details of any accident or incident you may have been involved in while on our premises or while taking part in one of our events or activities

While we mainly hold and use the information you provide directly to us, we may use other sources of information about you, including data derived from the electoral roll or affluence information, where they are from publicly available sources, or where you have given your permission for your data to be shared.

We do this to help ensure that we only contact you (where you have given us permission) with appropriate communications or requests for support. We take great care in sourcing this information, but if you prefer us not to, then please let us know:

Email:

Phone:

Postal address:

Cookies

We collect anonymised information about your visits to our websites using cookies. The information is invaluable to us to improve our website and ensure you are shown relevant content. More information about how we use cookies and how you can prevent this can be found in our Cookie Policy.

<https://www.mkcommunityfoundation.co.uk/cookies-policy/>

Where we collect your personal information from:

We collect personal information about you in several ways:

- via our website when you support us through making a donation; becoming a member; applying for or taking part in, organising or attending an event; joining a campaign, or pledging a gift in your will.
- when you contact us by mail, phone, email or live chat.
- when you complete one of our online or paper-based surveys.
- when you have used a social media platform to contact us – Facebook, Twitter, LinkedIn, Instagram or Google +.
- via an accident and incident form when you have been involved in an accident or incident on one of our premises or when attending one of our events or activities.

We may collect your personal information from other organisations and sources. For example, if you take part in an event run by another organisation with which we partner, such as the London Marathon; when you raise funds via JustGiving, Give As You Live or similar websites; or through social media platforms, e.g. Facebook, Twitter, LinkedIn, Instagram or Google +.

When providing information to us via these channels, you should check these companies' privacy policies and settings to understand how they use your personal information. We always check that third parties and other organisations have consent from you to pass your information on to us.

Building profiles of supporters and targeting our communications

We use profiling and screening techniques to ensure communications are relevant and timely, to target our resources effectively, and to provide an improved experience for our supporters. These activities allow us to understand the background of people who support us and help us to make appropriate requests to supporters who may be able and willing to give more than they already do. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would, so that we support more communities across Milton Keynes.

When building a supporter profile, we may analyse geographic, demographic and other information relating to you to better understand your interests and preferences in order to contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available.

Such information is compiled using publicly available data about you, for example from Companies House, information published in any type of media including magazines and newspapers, listed directorships or typical earnings in a given area. All this type of profiling is done under our internal processes and procedures that ensure we have the correct permissions to do so.

If you do not want us to carry out this type of profiling, then please let us know by contacting info@mkcommunityfoundation.co.uk or write to MK Community Foundation, Acorn House, 381 Midsummer Boulevard, Central Milton Keynes, MK9 3HP

How we use your personal information for marketing and fundraising

We only use your personal information for marketing where you have given us permission to do so, or you have provided permission to other organisations to allow us to market to you, for example, via Facebook or JustGiving.

Like most organisations we rely on marketing to help support the work we do and by using the information you provide to us we are able to contact you with specific marketing messages that we feel will be appropriate to you. Depending on the permission you have given us or another organisation this may be by post, email, telephone, SMS or social media.

To assist us in our marketing, in addition to the data that you provide to us, we may also obtain data from trusted third parties to help us understand what you might be interested in. This 'profiling'

information is produced from a variety of sources, including publicly available data (such as the electoral roll) or from sources such as surveys and polls where you have given your permission for your data to be shared.

When providing information to us through these channels you should check these companies' privacy policies and settings to understand how they use your personal information. We always check that third parties and other organisations have consent from you to pass your information on to us.

We understand that our supporter's circumstances change and you can easily withdraw the permissions you have given us, at any time either by using our contact details in this policy or by using the methods we tell you about in our communications e.g. using the 'unsubscribe' link on our emails.

Who we share your data with

We do not share or sell your data to any other charity or company for marketing purposes.

However, there are some situations where we use trusted suppliers to help us with administration of the services you have asked us to supply to you for example:

- IT companies to help us deliver our range of services
- mailing houses to despatch our newsletters, appeals and raffles or invitations for our events and fundraising materials
- agencies who handle your donations on our behalf or administer your online conference and event bookings
- companies who deliver bespoke events for us or who organise events in which we purchase charity places (e.g. the London Marathon)
- website hosting companies which we use to administer our website content
- a database company who support us in keeping all our records in order
- as and when required we will share accident and incident information with the Health and Safety Executive, our insurers and our solicitors.

We also use trusted suppliers to help us with marketing:

- email service providers to send our emails and manage your marketing permissions
- mailing houses to send out marketing by post
- telemarketing agencies to contact you by phone or SMS
- an organisation which helps us keep your information accurate and up to date.

Some of our suppliers may operate outside the European Economic Area (EEA). This requires us to ensure they provide an adequate level of protection in accordance with UK data protection law, for example the EU-US Privacy Shield Framework. By submitting your personal information to us you agree to this transfer, storing or processing at locations outside the EEA.

Under some circumstances we may be required to disclose or share your information without your consent, for example if we are required by the police, the courts or for other legal reasons.

How we keep your personal information up to date

Milton Keynes Community Foundation has a legal obligation under data protection legislation to keep the personal information it collects accurate and up to date. Among other things, it helps us ensure that we do not contact you with inappropriate information and marketing messages and also prevents us from wasting valuable funds on print and postage. We keep your information accurate as follows:

- By giving you the opportunity at any time to contact us to correct or change your information.
- By screening your name and postal address information against Royal Mail's National Change of Address File: where you have given your permission to Royal Mail, we can either update our records with your new address or note you have moved so we don't send anything to your old address.
- By using information publicly available to us.
- If you contact our us may ask you to confirm certain details.
- When we receive undelivered mail or email.

How we keep your personal information safe

We take our obligations to keep your personal data safe and secure very seriously.

Within Milton Keynes Community Foundation, access to your personal information is strictly controlled on a 'need to know' basis. Staff members and our nominated volunteers are only allowed access to your personal data if they have been sufficiently trained in data handling. We have specific technical controls in place to restrict access and these are monitored regularly. Our website is also monitored and protected to prevent it from unauthorised access.

All personal data sent to our trusted suppliers is encrypted. In all cases we require these companies to comply strictly with our instructions and they are not allowed to use your information for their own business purposes. We also require these companies to have sufficient organisational and technical measures in place to ensure the security of your data.

How long we keep your personal information

We keep your personal information in line with our data retention policy.

- In certain circumstances we have a statutory obligation to keep your personal information for a set period of time (normally six-seven years) and this mainly concerns financial information regarding your donations or Gift Aid contributions.

Your rights

Under UK data protection law, you have rights over personal information that we hold about you. We've summarised these below:

Right to access your personal information

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, send a description of the information you want to see to info@mkcommunityfoundation.co.uk or write to MK Community Foundation, Acorn House, 381 Midsummer Boulevard, Central Milton Keynes, MK9 3HP

Right to have your inaccurate personal information corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

Right to restrict use of your personal information

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

Right to erasure of your personal information

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.

Right for your personal information to be portable

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

Right to object to the use of your personal information

If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your information.

If you would like a copy of some or all of your personal information, please email or write to us using the contact details in this policy – we do not apply a charge for providing you with this information.

If we do hold information about you we will:

- give you a description of it.
- tell you why we are holding it.
- tell you who it could be shared with.
- let you have a concise and clear copy of the information.
- We want to make sure that your personal information is accurate and up to date and we will be happy to correct or remove information you think is inaccurate.

If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

If you want to exercise any of the above rights, please contact us by email info@mkcommunityfoundation.co.uk or write to MK Community Foundation, Acorn House, 381 Midsummer Boulevard, Central Milton Keynes, MK9 3HP.

We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's Information Commissioner's Office (ICO).

What to do if you have a complaint

If you have a complaint, please contact our Data Protection Officer by:

writing to: MK Community Foundation, Acorn House, 381 Midsummer Boulevard, Central Milton Keynes, MK9 3HP

or sending an email to info@mkcommunityfoundation.co.uk

If you are not satisfied with the way your complaint was handled, you can refer your complaint to UK Information Commissioner's Office at <https://ico.org.uk/concerns/>.

Links to other websites

We link our website directly to other sites, including sites that provide information, services, resources and fundraising opportunities that are not directly associated with us. This privacy notice does not cover the links within our site linking to other websites and organisations. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

This Privacy Notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of the Milton Keynes Community Foundation's collection and use of personal information. However, we are happy to provide any additional information or explanation needed using the contact details in this policy.

We keep our privacy notice under regular review. This privacy notice was last updated on: 17 July 2019