

FRIENDS OF TREAD PRIVACY POLICY

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?

Friends of TREAD is a UK registered charity which was founded in 2000 to support the work of TREAD India Trust. TREAD (Trinity Rural Educational Association for Development India Trust) is registered at its HQ 'Shiloh' in Bhadrachalam, Telangana, South India and started its work in 1999. TREAD aims to relieve poverty and advance education and health care in rural areas of Odisha, Telangana and Andhra Pradesh states. Its work is targeted at children, young people and their families. The trustees of Friends of TREAD are the data controller (contact details below). This means they decide how your personal data is processed and for what purposes.

3. How do we process your personal data?

The trustees of Friends of TREAD comply 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 administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, and activities;

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

There are a number of reasons why we would process personal data:-

- We have received your explicit consent to contact you so that we can keep you informed about news, events, and activities.
- We can legally process certain personal data if the charity is legally required to perform such processing eg. Complying with the provision of the Charities Commission or HMRC.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the charity in order to carry out a service to other charity members or for purposes connected with the charity. We will only share your data with third parties outside of the charity with your consent.

6. How long do we keep your personal data?

The length of time that we store your data will depend on the context in which you provided that data to us, for example in order to meet our legal and accounting requirements we will store records of any financial transactions for a minimum of six years, or Gift Aid related donations for a minimum of 12 years. We will continue to review the way we store and use your data ensuring that we do not hold onto data for any longer than necessary.

7. How we handle your data:

Any information you provide us with will be held on our databases which are securely stored and password protected. Certain information will also be stored elsewhere; for example

- If you ask to join any of our emailing lists your information will be handled by MailChimp and securely stored on their server and added to our own database. You can read their Privacy Policy at <https://mailchimp.com/legal/privacy>

We have chosen this software provider as they are an industry leader and were signed up to the EU US Privacy Shield, which is now no longer used. We have committed that we won't use a 3rd party to collect, manage and store

your data that doesn't comply with and operate at least the same level of protection as set out by the EU-US Data Shield.

Friends of TREAD does not sell or pass information to third parties, except where it may be necessary to share data in order to smoothly deliver Friends of TREAD's objectives. All trustees understand that data is confidential and should not be disclosed to a third party without the permission of the subject.

In case of financial transactions, we may need to pass on your data to our external independent examiner or HMRC to meet our statutory reporting requirements or to reclaim Gift Aid.

We do not pass any of your personal data on to other organisations or individuals for marketing purposes.

We do not have cookies on our Friends of TREAD website. The website is hosted by Alpha State under their GDPR.

8. 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 trustees of Friends of TREAD holds about you;
- The right to request that Friends of TREAD correct 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 Friends of TREAD 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),
- 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.
- The right to lodge a complaint with the Information Commissioners Office.

9. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Policy, 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.

10. Contact Details

Friends of TREAD is not required to identify a Data Protection Officer nor implement a DPIA (Data Privacy Impact Assessment).

To exercise all relevant rights, queries of complaints please in the first instance contact Matti Shannon who will act as the nominated Data Protection Lead within the charity and will act as a central point of information and control for matters relating to data protection and processing. He can be contacted at friendsoftread@hotmail.com. We do not use an external information processor.

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.