



THE ROGER & DOUGLAS TURNER
CHARITABLE TRUST

PRIVACY NOTICE

The Roger & Douglas Turner Charitable Trust (referred to as “the Trust”, “we”, “us” or “our”) is a Charitable Incorporated Organisation, regulated by the Charity Commission for England and Wales. The Trust’s Registered Charity Number is 1154467 and our Principal Office is at Arley House, Lion Lane, Upper Arley, Bewdley, Worcestershire DY12 1SQ.

Our website is www.arleyestate.co.uk

The Trust’s approach to data collection and data processing:

- The Trust respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data and will tell you about your privacy rights and how the law protects you.
- Under applicable law the Trust is a ‘Data Controller’. Our Data Protection lead person and data processor can be contacted at the Principal Office or by e-mail at info@arleyestate.co.uk.
- We operate in a transparent way in requesting and recording personal data. We acknowledge your right to access the data that we hold on you and to amend or change it if required. We will not retain your personal data longer than necessary. Where we discover a breach of data protection affecting you, we will notify you and will report it to the UK Information Commissioner’s Office, within 72 hours.

We may collect and process the following personal information or data about you:

We may collect, use, store and transfer different types of personal data about you as follows:

- **Identity and contact data:** this may include your name, date of birth, e-mail address, National Insurance number, postal address and telephone number;
- **Financial and Transaction data:** includes bank account details, payment and credit card information;
- **Technical data:** includes your Internet Protocol (IP) address, used to connect your computer to the internet, and details of which version of web browser you used;
- **Usage data:** includes questions, queries or feedback you leave, including your email address if you contact us or fill in a form on our website, or if you contact us by phone, mail, via social media or in person; includes information on how you use the website, using cookies and page tagging techniques, including Uniform Resource Locator (URL) activity. Cookies allow us to improve your website experience and provide site functionality so that you do not have to re-enter information.
- **Marketing and Communications data:** includes your preferences in receiving our marketing email, and how you use our emails - for example, whether you open them and which links you click on.

We do not collect what is known as ‘special category data’ about you - for example, race, religion, or health and medical information - unless you have consented to us doing so.

Giving us your information:

- We use different ways of collecting personal data from and about you. This includes: directly from you by you filling in forms, corresponding with us by phone, e-mail, post or otherwise. In addition, when you request marketing information or a quote for services. We also record personal information if you make a query or give us feedback or if you have a supplier or customer contract with us.
- Personal information which you provide us or which we collect about you remains your property and at any time during normal business hours you may ask us to tell you what we hold and to request that it is modified or deleted (see 'Subject Access Request' below).

How we use data and information that you give to us or which we collect from you:

There are a number of legal bases under which we can obtain process and keep your information:

- **Legitimate interest:** In using personal data to enable us to carry out the Trust's work, we rely on a condition known as 'legitimate interest'. This means that it is in our legitimate interest to collect your personal data to give us information needed to provide you with our services effectively. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Contractual basis:** We may also obtain and process your data where it is necessary to enable us to carry out any contract that you have entered into with us and to provide you with products, services and information requested from us;
- **Consent:** We may provide you with marketing information about our products and services. We will obtain your clear consent to processing your data, with a positive "opt-in" on paper or electronically. Your consent may also be withdrawn at any time by notifying us.

Disclosing your information:

We may have to share your personal data with third parties as below:

- Service providers who provide IT systems and administration;
- Professional advisors including our lawyers, bankers, auditor and insurers all based in the UK;
- HMRC, regulators and other authorities;
- Business partners, sub-contractors and suppliers who may be involved in carrying out and contract which we enter into with you or with them;
- To notify you about changes to our services or our contract with you.
- To improve our site and to measure the effectiveness of advertising and social media.
- We may share information with our wholly owned trading subsidiary, Arley House and Gardens Ltd (Company number 09448082).
- We may pass on your personal information if we have an overriding or legal obligation to do so (e.g., to safeguard an individual or prevent a serious crime), or if we have to enforce or apply any contract with you, including exchanging information with public agencies for legal reasons.
- We will not share your information with any other organisations for marketing, research or other commercial purposes.

Where your data is stored and how we keep it safe

- We store your data on our secure server or those of our third parties, or in our securely locked office.
- Sending information over the internet is generally not completely secure, and we cannot guarantee the security of your data while actually in transit. Any data that you send is at your own risk.
- We have procedures and security features in place to keep your data secure once we actually receive it.
- We require all third parties to respect your personal data and to treat it in accordance with the law. We do not allow third party service providers to use data for their own purposes. We only permit third parties to process your data for specified purposes in accordance with our instructions.

Your rights

- **Subject Access Request:** you can find out what information we hold about you; under applicable law, we will respond within one month;
- **Transfer of information:** you can ask for us to send you the information requested in a readily 'portable' format (i.e., that you can use elsewhere for another purpose) if the data was processed on the basis of consent or contract. If we refuse you all or any part of a request (e.g., if it is contrary to data protection law) we will send you a written refusal notice.
- **Object to, correct or restrict processing:** you can ask us not to use, to correct, or to suspend use of, any of the personal information that we collect.
- **Request erasure:** You may ask us to delete personal information where there is no good reason for using to continue to process it. You have the right to be 'forgotten' if we have no further use for your data.
- **Unsubscribe:** If you have signed up for email alerts, you can unsubscribe or change your settings at any time by contacting us and requesting us to unsubscribe.
- **Complaints:** If you wish to make a complaint about how we use your information, please contact us and we will do our best to help. If you are still unhappy, you can contact the Information Commissioner's Office via their website.

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This Notice is dated May 2018.
Owner - Data Protection lead for the Trust