

# Oaklea Privacy Statement

Oaklea's privacy statement sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

Oaklea's privacy statement may change so please remember to check back from time to time for updated changes. Where we have made any changes to this GDPR statement, we will make this clear on our website or contact you about any changes.

We are committed to treating you with respect and openness as outlined in our Working Behaviours and Business Commitments.

1. Who we are
2. How we collect information about you
3. Information we collect and why we use it
4. Legal basis for using your information
5. Marketing
6. Sharing your Information
7. Keeping your information safe
8. How long we hold your information for
9. Your rights

## 1. Who we are

Here at The Oaklea Trust, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Customer Advice Team or HR Department using one of the following

- Writing to Oaklea Trust, Second Floor, East Wing, Station House, Station Road, Kendal, Cumbria, LA9 6RY
- Calling us on 01539 735025
- Emailing to [hr@oakleatrust.co.uk](mailto:hr@oakleatrust.co.uk)

## 2. How we collect information about you

We collect information from you in the following ways:

**When you interact with us directly:** This could be if you ask us about our activities, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch via email, through the post, or in person.

**When you interact with us through partners or suppliers working on our behalf:** This could be if you access a service, which is delivered through a trusted organisation working on our behalf and always under our instruction.

**When you interact with us through third parties:** This could be if you provide a donation such as through Wishlist and provide your consent for your personal information to be shared with us.

**When you visit our website:** We gather general information which might include which pages you visit most often and which services or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you. Wherever possible we use anonymous information which does not identify individual visitors to our website.

## 3. Information we collect and why we use it

### Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and credit/debit card details (if you are making a donation to Wishlist or making a payment for services we may take your credit/debit card details, however we never store credit/debit card details and these are destroyed once the transaction is complete), as well as information you provide in any communications between us. You will have given us this information whilst making a donation or any of the other ways to interact with us.

We will mainly use this information:

- To process your donations
- To provide the services that you have requested.
- To update you with important administrative information
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

We may also use your personal information:

- To contact you about our work and how you can support Oaklea (see section 8 on 'Marketing' below for further information).
- To invite you to participate in surveys or research.

#### **A special note about the Sensitive Personal Information we hold**

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances.

## **4. Legal basis for using your information**

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you such as employment contract where consent is not required and this would be classed as a 'lawful' reason for holding personal details about you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Oaklea to process your information to help us to achieve our vision and working behaviours and business commitments.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

## **5. Marketing**

We will only contact you about our work by phone, email or text message, if you have agreed for us to contact you in this manner.

However, if you have provided us with your postal address we may send you information about our work and the services we offer by post unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting '[hr@oakleatrust.co.uk](mailto:hr@oakleatrust.co.uk)' or clicking the unsubscribe link at the bottom of the relevant communication.

## **6. Sharing your Information**

We will never sell or share your personal information with organisation's so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

Oaklea may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes.

We ensure that we comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

### **Legal disclosure**

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

## **7. Keeping your information safe**

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

## **8. How long we hold your information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

## 9. Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below.

If you wish to exercise any of these rights or make a complaint, you can do so by contacting our Communications and Administration Team or HR team at Oaklea, Station House, East Wing, 2ND Floor, Station Road, Kendal LA9 6RY by email at [hr@oakleatrust.co.uk](mailto:hr@oakleatrust.co.uk) and by phone on 01539 735025. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

To find out more about this privacy statement and how we look after your personal information, contact our HR team at [hr@oakleatrust.co.uk](mailto:hr@oakleatrust.co.uk) or on 01539 735025.