

<b>POLICY NAME</b>	<b>Privacy</b>			<b>POLICY NO.</b>	15
<b>EFFECTIVE DATE</b>	11.03.21	<b>DATE OF LAST REVISION</b>	-	<b>VERSION NO.</b>	01
<b>TO BE REVIEWED NO LATER THAN</b>	END FEB 2023				
<b>ADMINISTRATOR RESPONSIBLE</b>	Deborah Dial		<b>CONTACT INFORMATION</b>	Deborah.dial@masonfoundation.co.uk	
<b>APPLIES TO</b> Apply group names to define applicable areas of staff					
<b>GROUP 1</b>	Trustees	<b>GROUP 3</b>	Delivery partners	<b>GROUP 5</b>	Volunteers
<b>GROUP 2</b>	All Employees of The Mason Foundation	<b>GROUP 4</b>	SLT	<b>GROUP 6</b>	

<b>VERSION HISTORY</b>				
<b>VERSION</b>	<b>APPROVED BY</b>	<b>REVISION DATE</b>	<b>DESCRIPTION OF CHANGE</b>	<b>AUTHOR</b>
01	Stephen Mason	-	-	Anna Skeats

<b>RELATED POLICIES AND OTHER REFERENCES</b>			
<b>Policies</b>	<b>Templates</b>	<b>Training</b>	<b>Guidance/References</b>
GDPR (13)			
Confidentiality (14)			
Complaints			

## PURPOSE

General Data Protection Regulation (GDPR) provides the legal framework that defines how personal information can be used. The Mason Foundation is fully committed to complying with the principles set out in GDPR and has a legal duty to protect any information that is collected. The Mason Foundation is committed to protecting your privacy and compliance with all relevant legislation.

## SCOPE

This policy describes how The Mason Foundation collects, uses, stores, processes, and shares your information. It covers our treatment of information that is gathered by our website, including personally identifiable information or personal. This policy does not apply to information collected by third party websites or services, or personal data collected in the context of employment.

## CORE PRINCIPLES

The Mason Foundation provides individuals with all the following privacy information:

- The name and contact details of our organisation.
- The name and contact details of our representative (if applicable).
- The purposes of the processing.
- The lawful basis for the processing.
- The legitimate interests for the processing.
- The categories of personal data obtained (if the personal data is not obtained from the individual it relates to)
- The recipients or categories of recipients of the personal data.
- The retention periods for the personal data.
- The rights available to individuals in respect of the processing.
- The right to withdraw consent (if applicable).
- The right to lodge a complaint with a supervisory authority.
- The source of the personal data (if the personal data is not obtained from the individual it relates to).
- The details of whether individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to)
- The details of the existence of automated decision-making, including profiling

### Information we collect

For employees and volunteers:

- Name and address
- Phone number
- E-mail address
- Date of Birth
- Next of kin details
- Bank details & NI Number (staff only)
- HMRC/Pension details (staff only)

- Equality & Diversity information

For subscribers to the newsletter/bulletin:

- Name
- E-mail address

For visitors to the website:

- E-mail and contact details if registering with us
- Information about your use of our site including details of your visits such as pages viewed and the resources that you access. This includes traffic data, location data and other communication data
- IP address

## Use of Personal Information

The Mason Foundation use the information that we collect to provide our services. In addition to this we may use the information for one or more of the following purposes:

- To promote forthcoming events, for e.g. The Mason Mile Walk group dates/times
- To send out newsletters and bulletins that could include changes to our website
- For recruitment purposes, in particular, to determine the candidates' suitability for a specific role.
- To meet our obligations under the employment contracts and comply with legal obligations
- To contact staff relatives in cases of emergency

We use third parties to process some staff data, in relation to HR and payroll services. All data that is transferred for these purposes is done securely and with encryption.

## Lawful Bases

Of the six lawful bases for processing the data, we use:

- Consent: the individual has given clear consent for us to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- Legitimate Interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party

These are used as follows:

- Staff, ex staff and volunteers: Contract
- Job applicants: Consent
- The Mason Foundation Trustees: Legal Obligation
- Newsletter subscribers and attendees on training: Legitimate Interests
- Visitors to the website: Legitimate Interests

Where consent has been provided in advance we may allow selected third parties to use data to enable them to provide information regarding unrelated goods and services which we believe may be of interest. Where such consent has been provided it can be withdrawn at any time.

## Use of Cookies

A cookie is defined as a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. There are two types of cookies: those that are used to perform basic tasks and those that are used for analytics.

By using our website, our social media pages (such as Facebook, Twitter, YouTube, and Instagram), and/or subscribing to our services, visitors agree that, unless they have disabled them within their own internet browser, we can place them on their device and use that data in accordance with this Policy.

## Storing Your Personal Data

In operating our website, it may become necessary to transfer data that we collect to locations outside of the European Union for processing and storing. By providing personal data to us, it is agreed that we can process that data. We will ensure that data is treated and stored securely.

Unfortunately, the sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data sent to us electronically.

## Individuals' Rights

Under data protection legislation, individuals have rights over the data companies and organisations hold about them. They are as follows:

**Right to be informed:** The Mason Foundation will provide individuals with information that includes the type of data we collect, the purposes and lawful bases for processing their personal data, our retention periods for that personal data, and who it will be shared with. This is all contained within the Privacy Notice.

**Right of access:** individuals have the right to request access to the data The Mason Foundation holds about them. We have to provide that information unless there are legal exceptions. To receive that information, they need to send a description of the information required along with proof of their identity to the contact address at the bottom of this policy. The Mason Foundation will respond to the request within 21 days from the receipt of the request.

**Right to rectification of inaccurate data:** individuals have the right to having any inaccurate information corrected punctually. Accurate data is important to MVA and therefore we are constantly taking steps to correct any inaccuracies.

**Right to erasure:** individuals have the right to have their personal data deleted. The Mason Foundation will honour such requests, subject to certain exceptions (as defined by The Information Commissioner's Office)

**Right to restrict processing:** The Mason Foundation will restrict the processing of some or all of any personal information if there is a disagreement about its accuracy, or we're not lawfully allowed to use it.

**Right to data portability:** if The Mason Foundation processes personal information that has been provided by consent or is being used to carry out a contract with that individual, and is being processed by automatic means, we have to supply that information, if requested, to the individual, or another service provider in a machine-readable format.

**Right to Object:** individuals have the right to object to The Mason Foundation using their data if it is based on legitimate interests; for direct marketing or for statistical/research purposes.

**Right to lodge a complaint:** The Mason Foundation will treat any complaint seriously and will act on it within the timescales set out in the Complaints Policy.

### Third Party Links

The Mason Foundation may sometimes include links to third parties on our website; these links do not mean that we endorse or approve that site's policy towards visitor privacy. Individuals should review their privacy policy before sending them any personal data.

### Data Retention

We will keep data for no longer than is necessary for the purposes for which the personal data is processed, except in circumstances in which it is legally necessary to retain for longer periods E.g. employment records.

### Contacting The Mason Foundation

E-mail: [info@masonfoundation.co.uk](mailto:info@masonfoundation.co.uk) regarding any matter relating to this privacy policy.