



# Welcome to the Cameron Grant Memorial Trust Privacy Notice

**Cameron Grant Memorial 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.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice

## 1. Important information and who we are

### **Purpose of this privacy notice**

Cameron Grant Memorial Trust (herein after referred to as “CGMT” or “the Charity”) is registered with the Charity Commission for England and Wales as Charity number 1167221. CGMT works for the preservation and protection of good mental health in particular in young people by: raising awareness of young suicide; urging all who are suffering in silence to speak up and ask for help; supporting all who are fighting to overcome poor mental health, especially young people, and especially where this can be done through outdoor activities like hill-walking and Duke of Edinburgh’s Award, and; assisting in the provision of education and support that will help to increase awareness and knowledge of the issues around mental health and well-being for all and especially amongst young people. The delivery of our services requires us to collect, receive and hold, and process personal sensitive information and data.

Our privacy policy outlines to our users why we collect and process personal data.

### **Controller**

CGMT is the controller and the Board of Trustees is responsible for your personal data and information submitted by organisations or by individuals.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy

notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## Contact details

Our full details are:

- Full name of legal entity: Cameron Grant Memorial Trust
- Name or title of DPO: Evan Grant
- Email address: [DPO@camgrant.org.uk](mailto:DPO@camgrant.org.uk)
- Postal address: 23 Belle Vue Terrace, Hampton-in-Arden, Solihull, B92 0AR.

## Changes to the privacy notice and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we use to primarily to organise events, advise those who have expressed interest of news and forthcoming events, and to conduct legitimate activities such as design and distribution of Cameron's Coasters

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, tax information, pension information and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us
- **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services such as ticket to an event). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. How is your Personal Data Collected?

We use different methods to collect data from and about you including through:

- **Direct interactions** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - give us some feedback.
- **Automated technologies or interactions** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources** We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
  - Analytics providers such as Google based outside the EU.

### 4. How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing [DPO@camgrant.org.uk](mailto:DPO@camgrant.org.uk)

CGMT will only share personal information in the below circumstances:

- Only with the full consent of the service user and with the consent of the original point of referral should it be considered it to be a benefit to share the personal information of the individual with another organisation.
- If a Safeguarding issue is disclosed and our professional opinion deems it necessary to share and inform other about the potential risk – for example children services or the Police, in order to safeguard the individual and/or those around them.

## 5. How Long we Hold Personal Data

CGMT hold personal information for as long as consent is given or for as long as there is legitimate interest for CGMT in conducting activities such as providing Cameron's Coasters free of charge. Any information no longer required will be securely destroyed or deleted

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [DPO@camgrant.org.uk](mailto:DPO@camgrant.org.uk)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. The Right to Withdraw Consent at any Time**

Individuals may withdraw consent via email to [DPO@camgrant.org.uk](mailto:DPO@camgrant.org.uk) at any time and the services delivered will immediately cease.

## **7. The Right to be Forgotten**

Under specific circumstances individuals do have the right to have their personal information deleted and erased from our system. If individuals can request 'to be forgotten'. This request must be made in writing to CGMT stating name, DOB, address, the service or services used at CGMT if applicable and the reason for the request of information to be deleted.

Any requests will be considered by our Data Protection Officer and a decision will be sent in writing in no less than 30 working days.

## **8. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data

- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact [DPO@camgrant.org.uk](mailto:DPO@camgrant.org.uk)

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## LAWFUL BASIS

**Legitimate Interest** means the interest of our charity in conducting and managing our charity to enable us to give you the best service/product and the best and most secure experience. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting [DPO@camgrant.org.uk](mailto:DPO@camgrant.org.uk).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. ‘Contract’ includes free of charge agreements, eg, to supply Coasters.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.