

# Privacy Policy

Last Reviewed: 1 March 2024

Next Review: 1 March 2025

## Introduction

This document explains how we, the Community Foundations serving Lancashire and Merseyside (Community Foundations), use data about individuals.

## Why do we need your information?

We believe that thriving communities with caring people and strong voluntary groups give everyone the chance to achieve their best. Thriving communities are built on time, money and effort that enable ambition to be achieved, potential fulfilled and ends to be met. We use personal data to help organise the giving of that time, money and effort in Lancashire and Merseyside and the wider North West of England in support of those aims.

## Whose data do we collect?

We hold data on those who have given financial or other support to the Community Foundations, those who might do, and those who apply to the Community Foundations for grants, whether personally or on behalf of an organisation.

## How do we obtain your data?

The majority of the information we hold about you has been provided directly to us by you. In some cases, we may collect data from other sources. Examples include where existing supporters feel you may be interested in supporting our work and suggest your name to us, or data collected via a service provider like Virgin Money Giving or Just Giving.

We also collect data from publicly available sources. Examples include information gathered from a news article or online media, including social media like LinkedIn or Twitter. We may also use publicly available directories such as Companies' House.

## What are the legal grounds for our processing of your personal information?

Where it is needed to administer donations and grant applications in line with legislative and regulatory requirements, such as:

- Administering donations, including but not limited to funds which are subject to fund agreements.
- Administering grants and applications
- Administering memberships
- Building and managing volunteer support

Where it is in our legitimate interests to do so, such as:

- Maintaining up to date records
- Promoting CFLM aims and objectives.

- Planning and building financial support through fundraising and marketing activities.
- Sending communications about CFLM work
- Supporting governance of CFLM, including Charities Commission and Regulatory Reporting

We may use data obtained from external sources to ensure that your contact details are up to date, to support the planning of our fundraising (including using indicators of affluence to reflect the possible level of donation someone is able to make) and to ensure that appropriate due diligence is carried out to safeguard the assets and reputation of the Community Foundations.

## What we do with your data and why?

### Information on Supporters and Volunteers

We collect the information described below in order to promote the work of CFLM and build and manage financial and volunteer support.

We collect the following classes of information:

- Name(s) and address, email, phone number and other relevant contact details and preferences.
- Relevant family or friends' information including information on successor advisors.
- Occupation, skills and professional activity and network(s)
- Financial information and interest in philanthropy
- Information relating to links and connections with and in North West England
- Records of donations including assets used to make donations, Gift Aid status etc.
- Records of volunteering for the Community Foundations
- Information about our relationship with you, correspondence, meeting notes, attendance at events etc.
- Information necessary for us to manage funds you have established or supported including information on successor advisors.
- Information on membership of the Community Foundations where applicable

### Information on Grant Applicants

We collect the information described below in order to solicit and process applications for grants from the Community Foundations.

We collect the following classes of information:

- Name(s) and address, email, phone number and other relevant contact details and preferences.
- Purpose and details about an application for a grant
- Any other information needed for the assessment of a grant which may include financial, family, education and employment information.
- Details about any grant which was made, including information regarding progress on the use of the grant.
- Information about our relationship with you, correspondence, meeting notes, attendance at events etc.

### Protecting your data

We keep your data secure in our database with appropriate data security mechanisms in place.

In principle we do not share your data with anyone else or any other organisation unless it is necessary for the purpose for which you have given us the data. Examples are given below:

- We will provide information to HMRC on Gift Aided donations since we have a legal obligation to provide this information.
- We will share information on grant applicants with grant panel members and donors. These are volunteers working with the Community Foundations. We will also publish data on grant recipients for groups/organisations (amounts/names/purpose), but we anonymise details for any individual grantees.
- We may share basic information on the attenders at an event or function or meeting with the host or other person who has a volunteer role in the Community Foundations.

## Our responsibilities

The law requires us to tell you the basis on which we process your data.

- Some activities (for example sending you emails which promote the Community Foundations' interests) require your consent. If the law requires your consent to process data in a certain way, then we will obtain it before carrying out that activity.
- Other activities are carried out to fulfil a contract or agreement. Examples include holding funds which are subject to Fund Agreements or organising a ticketed event. Each requires us to know who you are and to process your information in order to do the thing you have asked us to do. If a contract is in place, then we will process your data based on that contract.
- In all other cases the law allows us to process your data if it is in our legitimate interest to do so, but only so long as we need to and your "interests or your fundamental rights and freedoms are not overridden." Practically speaking this means we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in this privacy notice.

We will keep data for as long as is needed to complete the task for which it was collected. Relationships between donors, grantees and the Community Foundations are often long term and so we expect to keep your data for as long as that relationship exists and in line with legal and regulatory requirements or guidance.

## Your rights

The law requires us to tell you that you have a variety of rights about the way we process your data. These are as follows:

- Where our use of your data requires consent, you may withdraw this consent at any time.
- Where we rely on our legitimate interest to process data, you may ask us to stop doing so.
- You may request a copy of the data we hold about you and we will respond within one month of receipt.
- You may change or stop the way in which we communicate with you or process data about you, and if it is not required for the purpose, you provided it, then we will do so. Activities such as processing Gift Aid donations, or managing a Fund Agreement, may mean we cannot entirely stop processing your data. However, we will always endeavour to comply with such a request.
- If you are not satisfied with the way we have processed your data, then you can complain to the Office of the Information Commissioner.

## Contacting us

If you have any questions about this privacy notice and about the way in which we process your data including how we communicate with you, please contact us:

Juliet Knight, Finance Director and Data Manager, or Rae Brooke, Chief Exec and Data Controller

3rd Floor Stanley Buildings, 43 Hanover Street, Liverpool, L1 3DN

T: 0330 440 4900 E: [info@cflm.email](mailto:info@cflm.email)

If you wish us to remove the personal data we hold, please email with the subject forgetme to E: [info@cflm.email](mailto:info@cflm.email)