



General Data Protection Regulations May 2018 (“GDPR”) (including the provisions of the Privacy and Electronic Communications Regulation – “PECR”)

PRIVACY NOTICE

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1. INTRODUCTION

The Rowdown Inspire to Aspire Foundation (“Rowdown Foundation” or the “Foundation”) is a registered charity (1151220) based in New Addington, Surrey CR0 0EG.

We are a registered charity that will provide funding to enable gifted children in New Addington to pursue an area of talent to further their ambition and eventually give them life-enhancing opportunities as they become young adults.

New Addington is an area of South London with high levels of social deprivation. The Foundation recognises that many parents cannot afford the private tuition or club fees that will enable their child to chase their dreams or that hard-working parents do not have the time to organise the tuition and get their child to the lesson or club. We can help with both.

It is essential that the child already shows some special ability and has a huge enthusiasm for their chosen area of interest. This is to ensure they will invest the time and effort to improve because otherwise the future opportunities will be limited and our support wasted. It is also essential that their parents exhibit the same levels of enthusiasm for their child’s ambitions.

We have set up a Tuition Programme which supports up to 20 academically able children per year to study for 11+ entrance exams and thereby access the best secondary education the area can offer through selective grammar and independent schools. We also support children in areas such as music, dance, art and gymnastics.

In just over 4 years, we have supported over 80 children to make the most of their talent.

2. WHAT THIS PRIVACY NOTICE COVERS

The Rowdown Foundation is committed to protecting your privacy in accordance with our obligations under data protection legislation, including the General Data Protection Regulations (“GDPR”) which come into force on 25th May 2018. This privacy notice explains what information the Foundation collects about you, how it is stored and kept secure, and how it will be used.

We promise to respect any personal data you share with us or that we get from other organisations and keep it safe. We aim to be clear when we collect your data about how it will be used and then not do anything you wouldn’t reasonably expect. We shall treat your personal information as we would want and expect another organisation to treat ours as individuals.

If you have any queries regarding this privacy notice or our approach to GDPR compliance, please email us at gary.coy@rowdownfoundation.org.uk or write to us at GDPR, The Rowdown Inspire to Aspire Foundation, 13 Higher Drive, Purley, Surrey CR8 2HP.

3. WHERE AND HOW WE COLLECT YOUR INFORMATION

We are a small charity and therefore we do not have sophisticated systems collecting or recording personal data. Personal data we obtain is usually given by the data subject to us for the purposes explained to or by them at the time. We may seek personal data from third party organisations to further our aim of supporting gifted and talented children. Information may be provided directly to us by their school, club or tutor where their parent has approved the release of such information.

We might also be given a contact name and email address for a representative of a local business and record this information in our contacts list. Occasionally we may obtain contact details through publicly available information such as a company website.

For children we are supporting, personal data will have been collected through an application or enrolment form completed and signed by a combination of their primary school and their parent. This is a necessary part of our relationship with you. This may include sensitive data on the child – such as references to their ability in the area that we are supporting them – and contact details for a parent(s) or guardian(s). At no time do we collect information which will allow us to communicate directly with the child.

Where you make an online donation either through our website or through a third party provider such as a credit card company or CAFDonate, JustGiving, Virgin Money Giving etc, they may provide the details necessary for us to record your donation and say thank you. We also use CAFBank for our online banking services and we store bank account details on that to allow us to make payments to those we are supporting. CAFBank is aware of its obligation to protect this information securely and we believe their data protection policy to be appropriate.

Where you wish to support the Foundation, you may be asked to provide contact details so we can keep you informed with what’s happening. Where you make a donation and provide a Gift Aid declaration, we will need to retain that information in our records.

Our website does not use cookies or any other analytical systems that records your visit and collects information about it.

4. WHAT INFORMATION WE COLLECT, WHY AND HOW WE USE IT AND HOW LONG WE KEEP IT FOR

The type of information we collect and retain and how we use it will depend on your relationship with the SECHC. In summary we will:

- collect your personal data through application forms and various other means. In the vast majority of cases it will be collected only with the data subject – or their parent’s – permission or involvement.
- collect personal data that will consist mainly of contact details but for those using our services and in some other cases we will collect more detailed information.
- retain the personal data provided on paper application forms securely and transfer the information to digital storage on a secure cloud server (Dropbox). Contact information is also usually stored in our Google Contacts. We have checked the providers reputation and data protection notices and we believe these to be secure methods of storage but we cannot be held responsible for how or where they store this information.
- occasionally receive your personal information through external event organisers or through third party websites such as VirginMoneyGiving or Eventbrite. Such information will be treated as if it was received from you directly and only used with your consent.
- use your personal data to offer our services to those we are supporting and to contact everyone regarding information on the Foundation and our services, fundraising information and appeals and events. We will only contact you if you have provided your consent to be contacted on these matters.
- never sell or swap your personal details with other organisations for their marketing purposes.
- ensure each general communication from us will either have an “unsubscribe” option and/or tell you how to contact us to request to amend your consents in order to prevent further contact from us for all or some of our communications.
- retain your personal data until such time as you ask us to remove it. Where we have supported children, we will retain their information for five years after the end of that support. For supporters, if we have not heard from you for a period of three years, we will contact you again to refresh our information we hold on you and ask again for your consent to its retention and how we may contact you in the future.

5. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

In some circumstances we will need to use your data as part of our support for a child or because we have a working relationship with you that requires that specific communication. At such times, we can rely on the “legitimate interests” legal basis for contacting you and we do not need your explicit consent.

In other circumstances, we will rely on your consent when using your personal data.

6. HOW WE KEEP YOUR PERSONAL DATA SECURE

Every effort is made to ensure all personal data is kept secure, whether in paper or digital form. Should you have any concerns regarding where and how your data is kept, please contact us on gary.coy@rowdownfoundation.org.uk.

Electronic records of personal data are held securely on the Dropbox Cloud or Google contacts. Access to such records is limited by the requirement of a log in to the specific Dropbox account which is protected by a personally chosen and secret password. Everyone with access to this Dropbox account is made aware of the strict rules we have regarding the security of personal data. Currently there are only two people with access to the Dropbox account but we retain the right to increase this as necessary for the conduct of our charity business.

7. KEEPING YOUR PERSONAL DATA UP TO DATE

As a small charity staffed entirely by volunteers, we endeavour to use publicly available information to keep the personal data we hold up to date. Given that most of the data we hold has been provided by individuals to us, we are somewhat reliant on those individuals telling us of any changes in their personal data that we hold.

As we rely on the personal data held to raise funds and inform everyone about our services, we would kindly request that you inform us if your contact details have changed or there has been a change in your circumstances that might affect how you want us to contact you.

8. SHARING YOUR PERSONAL DATA WITH THIRD PARTIES INCLUDING OUTSIDE THE EU

We will only share your personal data with third parties:

- a. where it is a necessary part of the services we provide. Examples are where we share information with the schools, clubs and tutors offering tuition and coaching to pupils we are supporting on our behalf;
- b. where we use a third party to process the data on our behalf. This will normally involve use of their software or hardware and includes CAF Bank, CAFDonate, credit card operators, Google Contacts etc;
- c. where we have a legal obligation to do so. For example, auditing of our accounts or provision of information to HMRC for Gift Aid purposes;
- d. where you have given your consent for us to do so.

Where third parties are involved, we ensure that they are contractually bound to keep your personal data secure and only use it for the specific purpose for which we have provided it to them.

Some of our suppliers may run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

9. HOW LONG WE KEEP YOUR DATA

We hold your personal data for as long as necessary to fulfil the purpose it was collected or the relationship with you is ongoing and then a reasonable retention period afterwards to ensure we can maintain accurate records of our services and your preferences. You will have the right to opt out of future voluntary contact

at any time. Where we have had no contact from you for five years, we will normally contact you one further time to seek your consent to future communications. If we do not receive any response, we will then remove your personal data from our records.

Please note that in certain circumstances we have a legal obligation to retain your information for a longer period, an example being the seven years required for HMRC audit purposes.

10. YOUR RIGHT TO YOUR PERSONAL INFORMATION

We respect your right to ask us at any time to disclose the personal information we hold on you. To access your right you can use one of the following methods:

- a. Write to Gary Coy, The Rowdown Inspire to Aspire Foundation, 13 Higher Drive, Purley, Surrey CR8 2HP.
- b. Email to gary.coy@rowdownfoundation.org.uk.
- c. Telephone 07768 170562 and ask to speak to or leave a message for Gary Coy.

In all requests, we will need your name, address, email address and copies of two proofs of identification (driving licence, passport, utility bills, letter from bank etc). We will respond within one month.

You have the right to request us to erase all or some of the personal information we hold on you where we have no compelling reason (legitimate interest) for continuing to hold such information.

11. UPDATES TO THIS PRIVACY NOTICE

We may from time to time make changes to this privacy notice. If we do make significant changes we will make this clear on our website or contact you directly using the personal data we hold. We would then offer you the opportunity to amend or withdraw your consents to our processing of your information.

We recommend you check our website Privacy Notice from time to time to note any changes.

12. RAISING QUERIES OR CONCERNS

If you have any questions, comments, or concerns about data protection at the Foundation please contact our Data Controller on gary.coy@rowdownfoundation.org.uk. If you are not satisfied with the response you receive from us for any reason then you may wish to contact the Information Commissioner's Office via <https://ico.org.uk/>.