

Privacy Policy

Updated by T Littlewood December 2023 | Approved by Trustees December 2023 | Review December 2024

We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The Matrix Trust Privacy Policy may change so please remember to check back from time to time. This is version 2.0 and was previously updated in March 2022. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

1. Who we are

The Matrix Trust, is 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.

The Matrix Trust (collectively referred to as "Matrix", "we", "us" or "our" in this privacy policy) are the a "data controller" for the purposes of the Data Protection Act 2018 and 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.

If you have any questions about this privacy policy, including any requested to exercise your legal rights, or for further information about our privacy practices, please contact our Data Protection Officer by:

• Writing to: The Matrix Trust, Allen House Pavilion, Eastgate Gardens, Guildford, GU1 4AZ

- Calling us on: 01483 574900
- Emailing: dpo@matrixtrust.com

2. How we collect information about you

Whether you are a supporter or being supported, we want to make sure you receive the communications that are most relevant to you, either by visiting our website or receiving emails, post or phone calls. We want to make sure we are protecting your data when you book on an event, attend a youth club or make a donation.

We collect information from you in the following ways:

When you contact us: Such as when you ask about our activities, register with us for training or an event, make a donation to us, 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 through the post, or in person. **When you engage with us through our partner churches or schools**: Such as when you attend Ready 4 Action as part of a Church Youth Group, or use our in-school services

When you engage with us through third parties: Such as if you provide a donation through a third party such as 'My Donate' or register on an event through 'Eventbrite' and provide your consent for your personal information to be shared with us.

When you visit our website: We may gather general information which might include which pages you visit most often and which services, events 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. We use this information to improve the functionality and usability of our website is presented. 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, gender, email address, postal address, telephone number, and if relevant, which Church you attend, as well as information you provide in any communications between us.

We will mainly use this information:

- To perform a 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 obligation.
- To process your donations or other payments, to claim Gift Aid on your donations To provide the services or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- 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.
- To keep you up-to-date with Matrix activities and news and how you can support us.
- To invite you to participate in surveys or research

If you do not provide the information we require from you, we will not be able to provide the relevant services to you (e.g. process your donation, sign you up for a particular event or provide goods and services you have requested). 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.

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.

Special Category Data

Data Protection Law recognises that some categories of personal information are more sensitive and require more protection ("Special Category Data"). Special Category Data can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious or philosophical beliefs.

If you speak to one of our team members, you may choose to provide details that would constitute Special Category Data.

If you share your personal experience or the experiences of a friend or relative with us, we may also collect this information and this may include Special Category Data. If you provide us with any Special Category Data by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

To increase awareness of the issues surrounding young people we will sometimes use anonymised personal stories (eg: on our website blog, newsletters and presentations). All Personal Data will be changed to ensure anonymity for the people involved. If you are happy to be named in stories shared you can let us know.

We will only use this Special Category Data:

To help you with your issue and for the purpose we collected the data. We will not pass on your Special Category Data to anyone else without your express permission, except in exceptional circumstances, in particular with regards to child protection and our Safeguarding Policy

4. Legal basis for using your information

Our lawful basis for processing your personal data will either be for performance of a contract with you, as necessary for our legitimate interests, necessary to comply with our legal obligations or we have your clear consent to process the data for the purpose.

Whenever we process your personal data 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 a good reason to protect your personal data which overrides the legitimate interest.

Some examples of where we have a legitimate interest to process your personal data 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 or users 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 and how you can support The Matrix Trust 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 how you can support The Matrix Trust by mail 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 <u>dpo@matrixtrust.com</u> 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 organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity. The Matrix Trust may however share your information with our trusted partners who we work with to carry out our services.

Our schools work is done in partnership with schools. All data is controlled by the school and all responsibility for the data falls under their privacy policy. The Matrix Trust may process this data for sharing via anonymised personal stories and impact analysis which is shared with schools, funders and the public through paper and online documents. Impact analysis is anonymous and is mainly statistical, with some anonymised stories.

Our community work (eg: Ready for Action and Youth Clubs) is done in partnership with statutory organisations (such as social services or the police), as well as churches and other local organisations. We may share personal data if it is necessary for us to meet the needs of a young person, however we will endeavour to gain consent from parents first, unless it is a safeguarding issue. We do not transfer your personal data outside the UK.

Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, including child protection, 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.

8. 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.

We limit access to your data to those employees, contractors, agents and other third parties who have a business need to know it. They will only process your data on our instructions and are subject to a duty of confidentiality.

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. You should therefore always take care whenever disclosing personal information about yourself online and such transmission is at your own risk. We will notify you of any data breach where we are legally required to do so.

Our websites may contain links to other sites. and enabling connections to third party websites, plug-ins or applications may allow third parties to collect or share data about you. While we try to link only to sites that share our high standards and respect for privacy, we do not control and 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 and we encourage you to read the privacy policy of every website you visit.

9. How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may include to fulfil legal, regulatory, tax or reporting obligations (for example, the collection of Gift Aid). To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your rights

You have various rights under Data Protection Law 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 The Matrix Trust, The Matrix Trust, Allen House Pavilion, Eastgate Gardens, Guildford, GU1 4AZ, by email <u>dpo@matrixtrust.com</u> and by phone on 01483 574900. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <u>https://ico.org.uk/</u> - we would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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 however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. 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, 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.

Request to transfer: You can 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.

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.

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.

11. Cookies

'Cookie' is a name for a small file, usually of letters and numbers, which is stored on your browser or the hard drive of your device if you agree when you visit a website. Cookies contain information that is transferred to your computer's hard drive.

How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience. We do not share the information collected by the cookies with any third parties

The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide.

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.

- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. As such if you visit the Mind website you may then be more likely to see adverts about Mind's work on other websites as your browsing suggests that this is an area of interest.

No cookies, please

You can opt out of all our cookies (except the strictly necessary ones).

But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

If you have any questions about how we use cookies, please contact us.

12. Monitoring

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.