

# Leeds Christian Community Trust

## Privacy Statement

Leeds Christian Community Trust (LCCT) is a registered charity in England and Wales (1096860) established in 2003. We are an 'Incubator' organisation and hub charity for emerging projects making a difference in Leeds. Projects can become member projects of LCCT, taking our charity number and benefitting from central functions such as accounting, insurance, policies, employment and also some development support as well as being part of a network which provides mutual support and sharing of skills. These projects work in different areas across the city, in a wide variety of fields such as support for refugee and asylum seekers, youth projects, support for vulnerable people, communication/network projects, dance and creative arts, and others.

LCCT want to represent best practice in good information governance and data protection, so we want to tell you that:

- We are registered with the Information Commissioner, and our registration number is A8905999.
- If you ever want to know what information we hold about you, you can ask for it (make a subject access request) using the contact details below.
- We work hard to keep all staff trained in the use and handling of personal information, and to keep all personal information safe, secure and up to date at all times.
- We will tell you what we would use your data for, and give you an opportunity to control what we do with it. You can do this at any time, as often as you like. We will always respect your decision.

LCCT is known as a 'controller' of the personal information you give to us and **we collect** it for the following reasons:

- to bid for, arrange and deliver contracts. For example, we will need and use the contact details of colleagues we work with, for work related purposes for the duration of contracts. If you have applied for membership/Trustee nomination we collect the data given on these forms.
- to administer our business. For example, we keep details of people who work with us for invoicing, payment, tax and payroll/HR purposes.
- to support our employees.
- to comply with legal or regulatory requirements.
- The kind of **information we collect** includes:
  - name and contact details;
  - employer and job title;

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LEEDS, LS6 3HN  
Tel: 0113 3508622 email: [info@lcct.org.uk](mailto:info@lcct.org.uk) www.lcct.org.uk  
Registered Charity Number: 1096860 Registered Company Number: 4632481

- financial details.

## **When LCCT collects/shares data**

- LCCT will be clear and explain why information is being collected and the way it is to be used, we will always ask for consent.
- We will ensure your privacy rights are protected.
- We will collect data if an accident or incident occurs on our office premises/events that involves members of staff or volunteers.
- LCCT collects information if you visit/use our website (please refer to our Cookies policy).
- We do not share the information we hold about people with anyone else apart from Payroll and for other contract purposes. However, we would disclose information on request to the Police or any other statutory authority or regulator who has a reasonable need for these data to effectively conduct their business e.g. criminal investigations.
- When you provide permission to other organisations to share it with us (including Facebook or Twitter)

All this applies to both LCCT and projects under the umbrella of LCCT.

## **How we use your information**

We will only use your information for the purpose or purposes for which it was collected for (or for closely related purposes). These purposes include:

- Where the information is needed to fulfil your request or to enable us to provide you with a more personalised service. Sometimes, with your consent, we will process your personal data to provide you with information that you have requested about our work or our activities, or that you are expecting.
- We use personal data for administrative purposes (i.e. to carry on our charity work). This can include receiving donations, processing and distributing grant applications, maintaining a database of supporters and friends and helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we will keep a record of this).
- Where we need to do this to fulfil a contract, or where we are required to do this by law or other regulations.
- When it is in our legitimate interests to do this and when these interests do not override your rights. These legitimate interests include providing you information of our work and future events, fundraising, newsletter requests, feedback, and other activities. Please see section 9 on 'Legitimate Interest' for more information.

### **Retention**

- We hold your information for only as long as is necessary for each purpose. We regularly review what information we hold and delete what is no longer required. LCCT have a retention policy and do keep financial records for up to 7 years, in line with financial best practice for our accounting purposes.
- If you decide not to support LCCT any longer, or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we do not accidentally duplicate information.

### **Data Security**

- We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of, your personal information.
- Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.
- Our electronic data is stored within secure cloud servers in the United States. Paper copies of any personal data are stored in secure locked cabinets.

### **Payment security**

- LCCT specific – if you wish to make donations to LCCT, we would never request your bank details directly. BACS payments can be made directly to our business bank account (details of which are available upon request), or via our secure online donation pages (provided by People's Fundraising).
- Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

## **Keeping you in control**

We want to ensure you remain in control of your personal data. The new General Data Protection Regulations (GDPR), gives everyone a number of very important rights. These include

- the right to ask us to remove your personal data from our records (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- the right to have inaccurate data rectified
- the right to request a copy of the information we hold about you

- the right to ask us to stop using your information for marketing or profiling, and
- where technically feasible, the right to obtain and reuse your personal data for your own purposes

You can change the way you hear from us or withdraw your permission for us to process your personal data at any time by using the contact details in section 11.

## **Cookies and website**

We use traffic log cookies to identify which pages of our website are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from our system. If you want to find out more see our Cookie Policy.

## **Legitimate interest**

Under the General Data Protection Regulation which came into force in May 2018, we have a number of lawful reasons that we can use (or 'process') your personal information. One of these lawful reasons is called 'legitimate interests'.

Legitimate interests means that we can process your personal information if:

We have a genuine and legitimate reason **and** we are not harming any of your rights and interests.

When you provide your personal details to us, we use your information for our legitimate business interests to carry out our work. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

Some typical examples of when we might use this approach are for preventing fraud; direct marketing; maintaining the security of our system; data analytics; enhancing, modifying or improving our services; identifying usage trends; and determining the effectiveness of our campaigns and fundraising.

LCCT will use various ways to achieve our mission and to support our objectives; we believe that people who share our values would like to know how to support us. We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate information and service. These are what we consider to be our 'legitimate interests' for holding and processing your data.

When we process your personal information for our 'legitimate interests', we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will 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). Remember, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting us.

### **Changes to the policy**

We will amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

### **12. Your Rights**

Should you require further information regarding your rights under the Data Protection Act 1998, this may be obtained from the **Information Commissioner's Office**.

### **13. How to contact us**

If you have any questions about the policy or how we use your data, please get in touch using the details below.

Email: [info@lcct.org.uk](mailto:info@lcct.org.uk)

Phone: 0113 3508622

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**DATE OF LAST REVIEW: October 2021**

**DATE OF NEXT REVIEW: October 2022**