

Privacy Notice for Charity Clients (HRNet)

What is the purpose of this document?

The Cranfield Trust collects and processes personal information about you during and after your relationship with us in order to manage that relationship. We are committed to being transparent about how we collect and use your data to meet our obligations under the General Data Protection Regulation (GDPR).

What personal information do we collect and how is it used?

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 will only process your personal information where we have a legal basis for doing so, as described in the table below.

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

Data we collect	What we use it for	Legal basis for processing data
Names, addresses, telephone numbers, email addresses	To contact you in connection with a specific enquiry, question or advice case; to keep you updated on our other services or activities and events; to send you HRNet bulletins, materials or other communications	Necessary for performance of contract
Information related to HRNet questions ('cases'), including confidential case notes, emails and supporting documentation (eg examples of policies or contracts of employment)	To record the details of any advice given, including confidential details of organisational HR issues; to maintain case details for a minimum of 6 years following the advice given for legal and insurance purposes; to use anonymised case monitoring data for statistical analysis and reporting and to inform the development of new services or marketing materials	Necessary for performance of contract and to comply with legal obligations
IP Addresses (Google Analytics)	Visitors to our Website for general enquiries may have their IP address logged for the purposes of tracking site traffic (this information is not stored in any of our systems). We use Google Analytics as our analytics provider – you can find out more about how Google Analytics collects and processes personal data here - https://policies.google.com/technologies/partner-sites . This does not apply to the HRNet online member pages.	Google is the data controller – please view their policies for more information.

Some of the above legal bases will overlap and there may be several bases which justify our use of your personal information.

To enable us to contact you and provide services in relation to your HRNet membership (our contract with you), it will be necessary for us to collect basic contact information via our online registration form where 'required fields' will be specified. If you fail to provide required information, we will not be able offer you the full range of our services.

How is your personal information collected?

We collect information through our HRNet registration process. We may sometimes collect additional information from third parties including business and social media searches such as LinkedIn, and publicly available sources such as Companies House and Charity Commission. We may collect personal information in the course of our service-related activities throughout the period of our relationship with you.

Automated Decision Making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Who has access to your data?

Your information may be shared internally, including with our volunteers offering pro bono consultancy and advice (our "Volunteer Advisers") and with staff members responsible for managing and administering HRNet, events and marketing activities. In most cases, HRNet questions are put to Volunteer Advisers anonymously, but in some cases, data identifying individuals may be shared, including sensitive case details.

We may also share your data with our third-party service providers, for example in connection with supporting our IT network (including remote support). Your data will be stored and processed using a CRM system provided by Salesforce who are also a data controller for the purposes of data protection legislation. You can find out more about what Salesforce does to protect your data by visiting https://www.salesforce.com/uk/company/privacy/full_privacy/ and <https://www.salesforce.com/uk/company/privacy>.

We require third parties to respect the security of your data and treat it in accordance with the law. We will share your information with third parties where we have a legal basis for doing so. In particular, we share information where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest (provided that processing does not outweigh your rights and freedoms). All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

Your personal information may be transferred to or stored in countries outside the European Economic Area (for example, where we use a service provider located outside the EEA). We will ensure that any international transfer of personal information is safeguarded as required under data protection law. Please contact us if you would like further information.

Data Security

The Cranfield Trust takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, or subject to unauthorised access. Where necessary, we implement appropriate network access controls, user permissions and encryption to protect data.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods, archiving and destruction policies for different aspects of your personal information are set out in our retention policy. Please contact us if you would like further information on data retention.

Your legal rights

As a data subject, you have a number of rights relating to your personal information including the right to request access to, deletion or correction of your personal information; to object to our use of your personal information; to request that we transfer your personal information to you or another data controller; and not to be subject to automated decisions. You can find further details of your rights at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If we do need to process your personal information on the basis of consent, you have the right to withdraw this consent at any time which you can do emailing mydata@cranfieldtrust.org. Please understand that we may need to verify your identity before we can process your request.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner (ICO).

Accessing your data

You will not have to pay a fee to access your personal information. However, if we think that your request is unfounded or excessive, we may charge a reasonable fee or refuse to comply with the request. We may need to confirm your identity to ensure that personal information is not disclosed to a person who has no right to receive it.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Queries and Further Information

The Cranfield Trust (Court Room Chambers, 1 Bell Street, Romsey, SO51 8GY) is the **Data Controller**.

For any queries, please contact **James Lennard, Head of Finance, Administration & Control** (mydata@cranfieldtrust.org).