# **Privacy and Security Policy**



This policy sets out how Spinnaker aims to repay the trust you have shown by sharing your personal data with the charity.

### Who are 'we'?

In this policy, whenever you see the words 'We', 'Us' or 'Our', it refers to Spinnaker Trust Ltd (Spinnaker). Spinnaker supports primary schools with people and resources for teaching Christianity through assemblies, lessons, clubs and special events and digital services.

The full legal information for Spinnaker is: Spinnaker Trust Ltd – a company limited by guarantee, with charitable status. Registered at 172 High Street, London, SE20 7QS. Reg. Company No: 05503977. Reg. Charity No: 1111351

In this policy, references to Digital Services means our websites at the following URLs: www.spinnaker.org.uk; www.smsc.org.uk and www.spinnakertrust.org.uk), and any software and webbased applications that we make available for your use.

Spinnaker also operates as administrator for the Stream network and as such implements this policy within the Stream network.

### Your acceptance of this policy, and our right to change it

By using our websites, social media pages, services or providing your information you consent to our collection and use of the information you provide in the way(s) set out in this policy. We will not contact you unless we have specific permission from you to do so. If you do not agree to this policy please do not use our sites, social media pages or services.

We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them. This policy was last changed on 29th January 2018.

### What is personal data?

Personal data is information that can be used to help identify and individual, such as name, address, phone number or email address.

# The policy in brief

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are – but if you don't have time to read it all now, here's a quick summary:

- We collect information that is either personal data (as outlined above) or non-personal data (such as IP addresses, pages accessed etc)We collect information to provide services, to provide information, to fundraise for our work, for administration, research, profiling, analysis, and for the prevention/detection of crime.
- We only collect the information that we need or that would be useful to us in our quest to provide the best possible service.
- We do our very best to keep personal information secure wherever we collect personal data, however collected.

- We only share data where we are required by law.
- Our websites use cookies for more information check our cookies policy.

They are the basics, but don't forget to come back later and read the full policy (below), so you've got all the details you need.

# The full policy

This policy applies to all the websites we operate, our use of emails and social media for marketing purposes, paper-based communications and any other methods we use for collecting information. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.

What information do We collect and why?

We will only ever collect the information we need – including data that will be useful to help improve our services. We collect two kinds of information:

- non-personal information such as IP addresses (the location of the computer on the internet), pages accessed, and files downloaded. This helps us to determine how many people use our sites, how many people visit on a regular basis, and how popular our pages are. This information doesn't tell us anything about who you are or where you live. It simply allows us to monitor and improve our service.
- personal information such as name, postal address, phone number, email address, date of birth (where appropriate), information about your church affiliation etc.

We collect this information in connection with specific activities, such as donations, newsletter requests, event bookings, feedback etc. The information is either needed to fulfil your request or to enable Us to provide you with a more personalised service. You don't have to disclose any of this information to browse the sites. However, if you do choose to withhold requested information, we may not be able to provide you with certain services.

We also use cookies on our websites. Please see our cookies policy at the bottom of this page for further information.

## What do We do with the information?

We will use the information you provide to:

- fulfil your requests such as newsletter requests, donations etc.
- process donations, or other payments and verify financial transactions
- identify visitors and contributors
- provide a personalised service to you when you visit our websites this could include customising the content and/or layout of our pages for individual users
- record any contact we have with you
- prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf
- to carry out research on the demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them and to enable us to improve our service.
- communicate with our supporters and service users
- if you have agreed to it, provide you with information that we think may be of interest to you.

# Using your information for marketing

We are changing our communications policy in line with GDPR guidelines. This means that, as of May 2018, unless you are actively involved, we only send marketing information to people who have specifically said that they agree to us doing this, and we will only do so in the way(s) they have agreed to.

If you want to receive this information but haven't opted in, you can do so by emailing <u>spinnaker@spinnaker.org.uk</u> or by calling our office on 020 8778 3181.

If we contact you by email, every message we send will include a link to opt out of receiving future messages if you change your mind. If we contact you by other means and you want to change this, please call our office on 020 8778 3181.

### Sharing your information

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or websites
- We are working with a carefully-selected partner that is carrying out work on our behalf.

## **Storing your information**

Information is stored by us on computers located in the UK and on reputable cloud-based storage systems. We may transfer the information to other offices and to other reputable third-party organisations for the purposes of back-up and mobile working. They may be situated inside or outside the European Economic Area. We may also store information in non-electronic forms.

We place a great importance on the security of all personally identifiable information associated with our supporters, customers and users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are permitted to access user information. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

Where you or we have provided a password enabling you to access parts of our websites or use our services, it is your responsibility to keep this password confidential. Please don't share your password with anyone.

We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to inform our research into the preferences of our supporters, to comply with the law, or to ensure we do not communicate with people that have asked Us not to. When we no longer need information, we will always dispose of it securely.

### What We don't do with your information

We never sell or share your information to other organisations to use for their own purposes.

# Your rights

The Data Protection Act gives you certain rights over your data and how we use it. These include:

- the right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed
- the right to prevent your data being used for direct marketing
- the right of access to a copy of the information We hold about you (known as a subject access request)

If you wish to exercise any of these rights please contact the Data Protection Officer in writing at Spinnaker Trust, 172 High Street, London, SE20 7QS.

For more information about your rights under the Data Protection Act go to the website of the Information Commissioner's Office at ico.org.uk.

Spinnaker Trust Ltd. is not a 'public authority' as defined under the Freedom of Information Act and We will not therefore respond to requests for information made under this Act; using the funds generously donated to us by our supporters for such activities is not in accordance with our charitable purposes.

## Cookies

We use cookies on our websites, for full details see our Cookies Policy.

# **Cookies Policy**

The Policy sets out what cookies are, why Spinnaker uses Cookies on its websites and your options relating to their use.

### Who are 'we'?

In this policy, whenever you see the words 'We', 'Us' or 'Our', it refers to Spinnaker Trust Ltd (Spinnaker).

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Spinnaker also operates as the administrator for the Stream network and as such implements this policy within the Stream network and its website www.streamschoolswork.org

When We provide services, we want to make them easy, useful and reliable. When services are delivered on the internet, it sometimes involves placing small amounts of information on your device, such as your computer or mobile phone. These include small files known as cookies. They cannot be used to identify you personally.

### What are 'cookies'?

In simple terms a cookie is a small piece of information sent from our website to your computer to help us recognise it quickly. If you prefer not to accept a cookie, you can navigate the websites like a normal user. Any information gathered through the use of cookies is compiled on an aggregate, anonymous basis.

## Do I have to agree to cookies?

Most web browsers automatically accept cookies, but if you prefer, you should be able to change your browser to prevent that. You should read the information that came with your browser software to see how you can set up your browser to notify you when you receive a cookie. This should then give you the opportunity to decide whether to accept it. However, you may not be able to take full advantage of a website if you do so. Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. If you do not change your browser settings and continue to use our websites, we will infer that you have consented to us using cookies for the purposes set out below.

### Why do We use cookies on our websites?

We use cookies so that we can give you a better experience when you return to our websites. In particular we use cookies to:

- avoid lengthy registration/personalisation of the site each time you visit and personalise it to suit your requirements
- recognise you when you login and make it easier for you to access your account information
- estimate our audience size and patterns
- ensure that you are not asked to register twice
- track preferences and to improve and update our websites

## Where can I get more information?

Further information about cookies can be found at Interactive Advertising Bureau.

Our websites may feature embedded 'share' buttons to enable users to easily share articles with their friends through a number of popular social networks. These sites may set a cookie when you are also logged in to their service. We do not control the dissemination of these cookies and you should check the relevant third-party website for more information about these.

### Other important information

#### Children's data

Some of the services we offer are aimed specifically at children (for example lunch time or after school clubs) and to deliver these services safely it is necessary for us to collect data and store it. Before we collect data from anyone under 18 we will always ask them to obtain the permission of a parent or guardian before registering with us. It is our policy not to request donations from children under 18.

#### Links to third party websites

Our websites contain links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

#### Social media sites

We operate social media pages on Facebook and Twitter. Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

#### Other people's data

Some of the services we offer allow you to provide the personal data of other people (e.g. tagging people on photos on social media). Before providing anyone else's data please ensure they are happy for you to do so and under no circumstances must you make public another person's home address, email address, or phone number.

### **Questions?**

If you have any questions about this policy or how we use data, please contact the Data Protection Officer at the address given above or via email (<u>spinnaker@spinnaker.org.uk</u>).