

Olive Academies Foundation Privacy Policy, March 2022



1. Introduction

Thank you for taking the time to read our privacy notice. We are Olive Academies Foundation. Our purpose is to fund projects which benefit vulnerable children and young people who have been or who are at risk of exclusion from school. Your support enables us to work toward achieving our purpose. When you support us and we engage with you, we will often receive your personal information (for example, your name, address and email address).

We recognise the trust you place in us when you share your personal information with us. We are committed to operating with openness, honesty and transparency. In this notice, we provide you with details of the personal information we collect when we engage with you, how we will use and look after your personal information, your privacy rights and how the law protects you.

2. Who we are

Olive Academies Foundation is a registered charity in England and Wales (number: 1195587). We are responsible for looking after your personal information.

If you have any questions about this privacy notices, including any requests to exercise your rights, please contact the foundation lead within Olive Academies Trust.

Name: Adam Tedesco

Address: Olive Academies Foundation, Inskip Drive, Hornchurch, RM11 3UR

Phone Number: 01708 982622

E-mail: adam.tedesco@oliveacademies.org.uk

3. The type of personal information we collect

Personal information is any information relating to an identified or identifiable individual. We may collect, use, store and transfer different kinds of personal information about you when we engage with you, including:

- Identity information including your name, gender, date of birth, username, and social media ID's or similar identifiers.
- Contact information including your billing address, delivery address, email address and telephone numbers.
- Donation/Transaction information including details about donations you have made and payments to and from you (including bank and credit card information), tax details for Gift Aid and other details of products and services you have purchased from us.
- Technical information including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions,

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operating system and platform and other technology on the devices you use to access this website.

- Profile information including your username and password, your interests, preferences, feedback and survey responses.
- Usage information including information about how you use our website, products and services.
- Marketing and Communications information including your preferences for receiving marketing from us and our third parties and your communication preferences. Where we refer to personal information in this notice, it might include any/all of the above.

We do not generally collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. There may be occasions where we collect a limited amount of health information (for example, if you take part in any event which requires physical activity, we may ask for certain medical information to ensure you are able to safely participate in the event). We will only collect such health information where we have your explicit consent.

4. How we get the personal information and why we have it

We collect personal information in the following ways:

- Directly from you - this includes where you donate or fundraise, sign up to one of our events
- Social Media – we may receive information through your use of social media (for example, Facebook, Twitter and YouTube), depending on your settings or the privacy policy of these social media sites. Please refer to the privacy policies that these sites use for details of how to change your settings.
- To build our understanding we may receive information from reputable public sources (for example, from newspapers, postings on LinkedIn or information held on Companies House), as well as information from third party organisations we engage to help us understand individuals' preferences and potential to provide us with donations, and to run any due diligence checks on our funded partners.
- Cookies (and automated technologies or interactions) – we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies. Please see below for more information on cookies.
- Third parties - we may receive personal information about you from various third parties including technical data from analytics partners like Google, from search engine providers like Bing Webmaster Tools, from technical, payment and delivery service providers like Worldpay and lifestyle and demographic insight data from third party segmentation/marketing partners.
- Third Party Websites – When you use our websites or otherwise engage with us, you may receive links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we would please encourage you to read the privacy notice of every website you visit as that will govern how that website will process your personal information.

- Third Party Platforms for funded partners – when you use our funding management system and any related tools or applications, we may use the information provided in order to contact you in connection with your activities and the funding, run any necessary verification, due diligence, fraud or monitoring checks, and arrange payment of the funding.

5. Legal basis for processing your personal information

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Your consent. Where we have your specific consent to use your personal information for a specific purpose (for example, where we contact you by email). You are able to remove your consent at any time by contacting adam.tedesco@oliveacademies.org.uk
- Where we process your personal information for our legitimate interests (or those of a third party). Please see “Legitimate Interests” – below.
- Where the processing of personal information is necessary to perform a contract with you (for example, where you have purchased a product from us).
- Where the processing of personal information is necessary to comply with a legal or regulatory obligation that applies to us (for example, in some instances, we may be required to share your information with the Charity Commission, Information Commissioners Office, other regulators or law enforcement agencies) or to use your information for due diligence or ethical screening purposes

6. How we use your personal information

We will not sell your personal information (and we also do not buy personal information). We only wish to contact you in a way that is consistent with our relationship (how you would expect to be contacted and with materials you would expect to receive from us).

Our communications may include information about our objective and work, the activities we fund and the impact of your support as well as requests for donations, fundraising or other support. We will use your personal information to tailor and target our communications to you.

We may use your personal information:

- To send you marketing emails or SMS texts where we have your consent.
- To contact you by phone.
- So that we can fundraise effectively and efficiently (for example, by analysing and segmenting our supporters by location, demographics, previous donations or previous activities and to identify your interests and motivations and the level of support you may potentially be able to give to us).
- For research and analysis purposes – this may include inviting you to participate in surveys or research or analysing usage data from our website to improve our content or user experience.
- For our charitable purposes (for example, where we tell stories to explain our objectives and the work we do).
- For the provision of services or administration – this may include:
- Dealing with donations, including communications to confirm and say thank you, for Gift Aid or for other administrative reasons relating to your donation.

- Dealing with any transaction you enter into with us and for us to fulfil any contract with you
- Managing our events.
- Dealing with entries into competitions and prize draws and any applicable prizes.
- Preparing reports about our work, services and events.
- When you contact us (for example, to ask questions).
- If you provide any content to us.
- Administering our websites and monitoring website use (to enable us to improve user experience).
- Responding to your enquiries, contacts or requests about your personal information.
- Notifying you about changes or updates to the website, our services or our funding processes (as applicable).
- Displaying content in a device appropriate way (for example, if you are using a mobile).
- For internal record keeping (we will keep a record of our relationship).
- For carrying out fraud prevention (and money laundering checks), undertaking credit risk activities and in relation to legal claims we take or defend.
- To safeguard those who work for or with us (or we otherwise engage with).
- To process and administer your application for a job (or to volunteer).

7. Legitimate interests

When we use our legitimate interests as the legal basis for processing your personal information, we will consider and balance any potential impact on you and your rights before we process your personal information. We will only then proceed where we believe our interests are not overridden by the impact on you. Our legitimate interests include the interests of our organisation in conducting and managing our operations to enable us to give you the best service and the best and most secure experience, and where we believe it to be in the public interest to process your personal information. Specific examples of this include:

- Sending you information and marketing materials to your postal address
- Analysis and profiling of our supporters
- Using third party sources to keep your postal address up to date
- Use of personal information to monitor use of our website (and apps) for technical purposes

In relation to funded partners, monitoring and evaluating funding, activities and compliance with their Conditions of Funding, audit checks and conducting organisational checks and verifications for fraud or error detection

8. We respect your preferences

If you would like us to:

- Stop using your personal information for any of the purposes set out above and/or
- Stop sending you marketing materials or other communication

You can let us know at any time and we will respond as you wish.

9. Engagement periods

We will deem specific consent you have provided us in relation to email marketing materials to be valid for the period **of 24 months** from your last engagement with us. Where we rely on legitimate

interest as the legal basis for contacting you (for example, by post), we may extend this period to 48 months from your last engagement with us. Engagement includes, but is not exclusive to, opening emails, making a donation or other fundraising activity.

10. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

11. Change of purpose

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact adam.tedesco@oliveacademies.org.uk.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

12. Children

We will collect personal information and engage with you in accordance with this privacy notice, however, please note, if you are under 18, you must have your parent or guardian's permission before you provide us with any personal information. If you are 14 or under we will require a parent or guardian's email address before we engage with you and we will then contact such parent or guardian to verify that we may engage with you (and will typically then collect the parent or guardians' personal information and not that of the child).

13. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

14. Data retention – how long with we retain your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and to enable us to continue to tell our story and promote the work of our funded partners (which will include reference to archive material).

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

At the end of an agreed retention period your information will either be securely and confidentially destroyed or anonymised. Anonymisation is the process of either encrypting or removing personal information from data sets, so that it is not possible to identify individuals from the data.

15. Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at adam.tedesco@oliveacademies.org.uk if you wish to make a request.

16. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at adam.tedesco@oliveacademies.org.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>