St Osyth Priory & Parish Trust

Privacy Policy

Introduction

St Osyth Priory & Parish Trust is committed to the responsible management, use, and protection of personal data in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018, and other relevant data protection laws. This policy describes how the Trust uses personal data, what data the Trust collects and how the Trust uses it.

Individuals (customers, staff and volunteers) have the legal right to access the personal data the Trust holds about them and to control how we use it.

Who we are

St. Osyth Priory and Parish Trust ("we", "us", "our"), (Company No. 09367206), a registered charity in England and Wales (Charity No. 1170037).

Contact: in writing at St. Osyth Priory Education Centre, Colchester Road, St. Osyth CO16 8HA or by emailing admin@prioryeducationcentre.co.uk.

If you would like to speak to us please telephone us on 01255 411747 or 07477083454.

We, The Trust, are the data controller for the personal data we collect and process.

What Personal Data We Collect

We may collect and process the following categories of personal data:

- Title, full name
- Date of birth
- Postal address
- Email address
- Telephone numbers
- Purchase, booking and donation history

- Records of correspondence, enquiries or complaints
- Accessibility, mobility information
- Children's information (only where necessary and with appropriate consent)

We do not collect or store payment card details; these are processed securely by our payment provider.

How we collect personal data

The way we collect this data may include but is not limited to:

- Directly from you (online forms, booking forms, donations, enquiries, surveys)
- When you subscribe to marketing communications
- When you make purchases, bookings or donations
- When you correspond with us via phone, email or post

Special Category Data

Where we collect information relating to health, accessibility or children, we only process this data where:

- You have given explicit consent, or
- Processing is necessary for safeguarding, or
- Processing is necessary to fulfil a contract (e.g., accessibility needs for event attendance)

We apply additional security and access controls to this data.

How we use your Personal Data (Purpose)

We will only use your personal data when we have a lawful basis for doing so.

We use your data to:

- Provide and manage event bookings, visits and donations
- Process payments
- Respond to enquiries, feedback and complaints
- Keep accurate internal records
- Send service-related communications (e.g., changes to events or terms)
- Conduct surveys to improve services
- Personalise communications
- Send marketing communications where you have opted-in
- Comply with safeguarding, health and safety and tax obligations

Lawful Bases for Processing (UK GDPR)

a) Consent

- For sending email marketing communications
- For use of photographs or special category data

You may withdraw consent at any time by contacting (add in correct email address) uk.

b) Contract

To fulfil or enter into a contract—for example:

- Event bookings
- Product purchases
- Processing donations where necessary

c) Legal obligation

Including:

- Health and safety records
- Safeguarding duties
- HMRC and Gift Aid requirements
- Prevention and detection of crime

d) Legitimate interests

We may use your data where it is necessary for our legitimate interests and does not override your rights, for example:

- Improving our services
- Preventing fraud
- Ensuring security of our premises and systems
- Sending relevant non-marketing service communications

e) Vital interests

- If necessary to protect someone's life (rare).

f) Public task

- Where we carry out activities in the public interest as an heritage/educational charity.

Marketing Communications

We will only send you marketing emails where you have actively opted in.

- You may unsubscribe at any time by emailing admin@prioryeducationcentre.co.uk
- Unsubscribing does not affect service-related communications (e.g., booking confirmations).

Please note, if you do not choose to receive this information, we will be unable to keep you informed of new services, products, events or special offers that may interest you and our ability to inform you of T&Cs updates may be affected.

Photography

We will not take or use photographs of participants without specific written consent from the school, organisation or parents/guardians (for children under 18).

Names of children will never be published alongside images.

Sharing Your Information

We may share your data with:

- Professional advisers (e.g., insurers, solicitors)
- Payment service providers
- IT system providers
- Regulatory bodies (where legally required)

The sharing of data is for the limited purpose of:

- **obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, defence of legal claims.**
- processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

We do not sell your information or share it with third parties for marketing.

We ensure that any third parties processing personal data on our behalf are subject to data processing agreements, etc and appropriate safeguards.

International Transfers

If any third-party processors store data outside the UK, we ensure they provide adequate protections, such as:

- UK adequacy regulations, or
- International Data Transfer Agreements (IDTAs), or
- Standard Contractual Clauses

(Currently, your data is not transferred outside the UK unless expressly stated.)

Cookies

We use cookies, pixel, and other similar technologies to operate our site and provide analytics:

Strictly necessary cookies: essential for core functionality

Analytics cookies: help us understand usage to improve our site.

Cookies are set via our cookie banner/cookie management pop-up before any cookies are set. You can modify your cookie preferences at any time via the floating cookie button in the bottom left corner of any page. The cookies we employ are detailed below:

Cookie	Purpose	Type	Provider	Retention
nb-cookies	Store cookie preferences	Necessary	St. Osyth Priory & Parish Trust	180 days
.AspNetCore.Antiforgery.*	Prevention of CSRF attacks	Necessary	St. Osyth Priory & Parish Trust	Session
_ga	Used to distinguish users	Analytics	Google	400 days
_ga_*	Used to persist session state	Analytics	Google	400 days

**: indicates subsequent unique ID*

Further guidance: https://ico.org.uk/for-the-public/online/cookies/

Data Security

We use technical and organisational measures to protect your data, including:

- Encrypted payment gateways
- Secure databases and restricted access
- Staff training

- Physical security for paper records

Only authorised staff and contractors may access your data.

Data Retention

We retain personal data only for as long as necessary for the purpose collected, including:

- Financial records (up to 7 years for legal purposes)
- Gift Aid declarations (6 years after the end of the accounting period)
- Booking and safeguarding records (in line with statutory guidance)
- Marketing data: until you unsubscribe

Where no retention period is required by law, we will retain data only as long as reasonably necessary.

You may request that your data be deleted, unless we must retain it for legal or contractual reasons.

Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Correct inaccurate data
- Request deletion of your data
- Object to processing (including marketing)
- Restrict processing
- Data portability (where applicable)
- Withdraw consent at any time

To exercise any right, contact: admin@prioryeducationcentre.co.uk

The Trust is committed to resolving concerns about the use of personal data fairly and promptly.

Any individual who has concerns about how the Trust has collected, used, stored, shared or otherwise processed their personal data may submit a complaint in writing to the Trust's nominated Data Protection Lead.

The Trust will:

• Acknowledge receipt of the complaint within 30 calendar days.

• Investigate the matters raised and make appropriate enquiries.

• Keep the complainant informed of progress where an investigation is ongoing.

• Communicate the outcome of the investigation, including any action taken by the Trust.

• Inform the complainant of their right to escalate the matter to the Information Commissioner's Office (ICO) if they remain dissatisfied.

You also have the right to make a complaint to the Information Commissioner's Office (ICO):

https://www.ico.org.uk

In addition to complaints, individuals have the right to confirm whether their personal data is being processed and to request a copy of that information (Subject Access Request [SARs]).

Requests may be made in writing or electronically and should be directed to the Trust's nominated Data Protection Lead.

Upon receipt of a Subject Access Request, the Trust will:

• Verify the identity of the requester where necessary.

• Record the request and relevant deadlines.

• Conduct reasonable and proportionate searches for personal data held by the Trust.

• Consider whether any exemptions apply under data protection legislation.

• Respond without undue delay and normally within one calendar month.

• Maintain appropriate records of requests and responses.

Where information is withheld under a statutory exemption, the Trust will explain the basis for that decision unless prevented from doing so by law.

Individuals dissatisfied with the Trust's response may raise a complaint through the Trust's Data Protection Complaints Procedure and may also complain to the Information Commissioner's Office (ICO).

Policy Review

This policy will be reviewed annually at the Trust's AGM or as needed to ensure compliance with new or revised data & privacy protection laws, guidance from the ICO, or changes in the Trust's operations. Amendments will be approved by the Board of Trustees.

APPROVED:

DATE:

REVIEW & REVISION: