



## Privacy Policy

We want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The Matrix Trust Privacy Policy may change so please remember to check back from time to time, this is version 1.0 and was last updated on the 16<sup>th</sup> March 2018. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

We are committed to treating you with respect and openness as outlined in our [Supporter Promise](#).

### 1. Who we are

The Matrix Trust, is committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Data Protection Officer by:

- Writing to: The Matrix Trust, Allen House Pavilion, Eastgate Gardens, Guildford, GU1 4AZ
- Calling us on: 01483 574900
- Emailing: [info@matrixtrust.com](mailto:info@matrixtrust.com)

### 2. How we collect information about you

Whether you are a supporter or being supported, we want to make sure you receive the communications that are most relevant to you, either by visiting our website or receiving emails, post or phone calls. We want to make sure we are protecting your data when you book on an event, attend a youth club or make a donation.

*We collect information from you in the following ways:*

**When you contact us:** Such as when you ask about our activities, register with us for training or an event, make a donation to us, apply for a job or volunteering opportunity, or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, or in person.

**When you engage with us through our partner churches or schools:** Such as when you attend Ready 4 Action as part of a Church Youth Group, or use our in-school services

**When you engage with us through third parties:** Such as if you provide a donation through a third party such as 'My Donate' or register on an event through 'Eventbrite' and provide your consent for your personal information to be shared with us.

**When you visit our website:** We may gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. We use this information to improve the functionality and usability of our website is presented. Wherever possible we use anonymous information which does not identify individual visitors to our website.

### **3. Information we collect and why we use it**

#### **Personal Information**

Personal information we collect includes details such as your name, date of birth, gender, email address, postal address, telephone number, and if relevant which Church you attend, as well as information you provide in any communications between us.

#### **We will mainly use this information:**

- To process your donations or other payments, to claim Gift Aid on your donations
- To provide the services or goods that you have requested
- To update you with important administrative messages about your donation, an event or services or goods you have requested
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts so we can assess any risks associated with accepting their donations
- To keep a record of your relationship with us
- Where you volunteer with us, to administer the volunteering arrangement
- To keep you up-to-date with Matrix activities and news and how you can support us
- To invite you to participate in surveys or research

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide goods and services you have requested.

#### **Sensitive Personal Information**

If you share your personal experience or the experiences of a friend or relative, we may also collect this information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

To increase awareness of the issues surrounding young people we will sometimes use anonymised personal stories (eg: on our website blog, newsletters and presentations). All Sensitive Personal Information will be changed to ensure anonymity for the people involved. If you are happy to be named in stories shared you can let us know.

## **A special note about the Sensitive Personal Information we hold**

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you speak to one of you team members, you may choose to provide details of a sensitive nature.

### **We will only use this information:**

- To help you with your issue, for training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances, in particular with regards to Child Protection and our Safeguarding Policy

## **4. Legal basis for using your information**

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (for example, because you have signed up to an event).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for The Matrix Trust to process your information to help us to achieve our vision and mission.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters or users are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

## **5. Marketing**

We will only contact you about our work and how you can support The Matrix Trust by phone, email or text message, if you have agreed for us to contact you in this manner.

However, if you have provided us with your postal address we may send you information about our work and how you can support The Matrix Trust by mail unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting [info@matrixtrust.com](mailto:info@matrixtrust.com) or clicking the unsubscribe link at the bottom of the relevant communication.

## **7. Sharing your Information**

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

The Matrix Trust may however share your information with our trusted partners who we work with to carry out our services.

Our schools work is done in partnership with schools. All data is controlled by the school and all responsibility for the data falls under their Privacy Policy. However, The Matrix Trust, will process this data for sharing via anonymised personal stories, impact analysis which is shared with schools, funders and the public through paper and online documents. Impact analysis is mainly statistical, with some anonymised stories.

Our community work (eg: Ready 4 Action and Youth Clubs) is done in partnership with statutory, church and local organisations. We may share personal data if it necessary for us to meet the needs of a young person, however we will endeavour to gain consent from parents first, unless it is a safeguarding issue. The Matrix Trust, may process your data for sharing via anonymised personal stories, impact analysis which is shared with schools, funders and the public through paper and online documents. Impact analysis is mainly statistical, with some anonymised stories.

### **Legal disclosure**

We may disclose your information if required to do so by law (for example, to comply with applicable laws, including Child Protection, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

## **8. Keeping your information safe**

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites.

## **9. How long we hold your information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

## **10. Your rights**

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting The Matrix Trust, The Matrix Trust, Allen House Pavilion, Eastgate Gardens, Guildford, GU1 4AZ, by email [info@matrixtrust.com](mailto:info@matrixtrust.com) and by phone on 01483 574900. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

## 11. Cookies

'[Cookie](#)' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or table when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

### How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

### The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their [UK Cookie Guide](#).

### We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.

- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. As such if you visit the Mind website you may then be more likely to see adverts about Mind's work on other websites as your browsing suggests that this is an area of interest.

### **No cookies, please**

You can opt out of all our cookies (except the strictly necessary ones). [Find out how to control and delete cookies](#) in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to..

If you have any questions about how we use cookies, please [contact us](#).

## **12. Monitoring**

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

To find out more about this policy and how we look after your personal information, contact the team at [info@matrixtrust.com](mailto:info@matrixtrust.com) or on 01483 574900

*Draft Privacy Policy May 2018*

*Revision date: July 2018*