**Enovert Community Trust Privacy Policy**

**Introduction**

This Privacy Statement explains how Enovert Community Trust (ECT) collects, uses and safeguards the personal information that you provide to us when applying for and being awarded a grant by the Trust.

ECT provides funding through the Landfill Communities Fund (LCF). This is a tax credit scheme enabling operators of landfill sites in England and Northern Ireland to contribute money to organisations enrolled with ENTRUST as Environmental Bodies (EBs). The Trust receives contributions from Enovert Management Limited in order to enable funds to be distributed to qualifying community and environmental projects. ECT is registered as a data controller with the Information Commissioners Office (ICO) under registration number Z2194813 and committed to ensuring the safeguarding, security and privacy of individuals’ information and dedicated to compliance with the General Data Protection Regulation and any successor legislation.

ECT’s Privacy Policy is aimed to provide transparency, to be clear and concise about what personal details we require, why we need them, how it will be used, who it is shared with and your rights.

**What you can expect from ECT**

Everyone who applies for funding from ECT should feel confident and comfortable with how any personal information you share with the Trust will be looked after or used. This Privacy Policy sets out how ECT collects, uses and stores your personal information (this means any information that identifies or could identify you).

The ECT Privacy Policy may change so please remember to check back from time to time. This policy was last updated in September 2019. Where ECT has made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

**Who we are**

ECT 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.

ECT is a “data controller” for the purposes of the Data Protection Act 1998 and 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.

**Information ECT collects and why we use it**

**Personal Information**

Personal information we collect includes details such as your name, email address, postal address, telephone number (all for contact purposes only), and your (organisation’s) bank details (if you are to be in receipt of a grant/grant payments), as well as information you provide in any communications between us.

**We will mainly use this information:**

* to communicate with you by email, post or phone regarding funding, to give advice and make payments;
* to administer records, including regulatory requirements, after your project has completed (if required);
* to be able to process your funding application;
* to be able to process your award compliantly;
* to obtain information, documents or updates regarding your project, whether at application stage or after being awarded funding;
* to process and complete Contributing Third Party requirements;
* to respond to an enquiry whether received by post, email or through our online form;
* to arrange for representatives of ECT to attend your events or respond to invitations.

If you do not either provide this information or choose not to allow us to contact you or your organisation throughout the application process we will not be able to process your grant.

**We may also use your personal information:**

* To contact you about events, opportunities or provide additional information concerning grant availability
* To invite you to participate in feedback, surveys or research
* To publicise the award or use of a grant by an organisation

**Sensitive Personal Information**

If you share your personal experience or information of a confidential nature with us we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

**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 been awarded a grant and signed a contract).  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 ECT to process your information.

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 client beneficiaries are, improving our services, for our legal purposes (for example, dealing with complaints and claims).

**Sharing your Information**

The personal information we collect about you will only be used by ECT so that it can support you.

We will never sell or share your personal information with any other organisations so that they can contact you for any marketing activities, other than the Trust’s PR agency Quantum PR, who may contact you in relation to promotion of your project.

**Legal disclosure**

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

**Keeping your information safe**

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

**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 or contractual obligations.  After this date any data we hold we will delete, destroy or confidentially dispose of via a trusted service provider.

**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 ECT by contacting Angela Haymonds Trust Secretary atahaymonds@ibstockenovert.org or telephone 01753 582513.  You can also make a complaint to the data protection supervisory authority, the Information Commissioner’s Office at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

**https://ico.org.uk/ concerns/handling/**

**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, and how long we keep it for. 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. Please contact us as noted above, providing details of your objection.

**Rectification**: You can ask us to change or complete any inaccurate or incomplete personal information held about you.

**Complaint to Information Commissioner:** You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

**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.

**Portability**: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

**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.

**Automated individual decision-making:** We do not make any decisions based on your personal data.

**Social Media:** We may use social media to comment on a project event or re-tweet any that we have received. Please refer to the relevant social media website for furtherinformation on how they use your personal data.

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

To find out more about this policy and how we look after your personal information, contact Angela Haymonds Trust Secretary atahaymonds@enovertct.org or telephone 01753 582513.

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