

Project Gambia Trust

GDPR Policy

June 2021

1. Introduction

1. We are committed to safeguarding the privacy of our website visitors and service users.
2. This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
3. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
4. In this policy, “we”, “us” and “our” refer to Project Gambia Trust Ridgewood. For more information about us, see Section 12.

2. Credit

1. This document was created using a template from SEQ Legal (seqlegal.com).

3. How we use your personal data

1. In this Section 3 we have set out:
 1. the general categories of personal data that we may process;
 2. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 3. the purposes for which we may process personal data; and
 4. the legal bases of the processing.
2. We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
3. We may process your account data (“account data”). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.



4. We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (“notification data”). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
5. We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
6. We may process data relating to any donations you may make to us. The source of this data is you. This data may be processed for specify purposes. The legal basis for this processing is our legitimate interests, namely the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
7. We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
8. We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
9. In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
10. Please do not supply any other person’s personal data to us unless we prompt you to do so.

4. Providing your personal data to others

1. We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
2. We may disclose your personal data for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
3. In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.



5. Retaining and deleting personal data

1. This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
3. Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

1. We may update this policy from time to time by publishing a new version on our website.
2. You should check this page occasionally to ensure you are happy with any changes to this policy.
3. We may notify you of changes to this policy by email.

7. Your rights

1. You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 1. the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
2. We may withhold personal information that you request to the extent permitted by law.
3. You may instruct us at any time not to process your personal information for marketing purposes.
4. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

8. About cookies

1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
2. Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

1. We use cookies for the following purposes:



1. authentication – we use cookies to identify you when you visit our website and as you navigate our website;
2. status – we use cookies to help us to determine if you are logged into our website;
3. personalisation – we use cookies to store information about your preferences and to personalise the website for you;
4. security – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
5. analysis – we use cookies to help us to analyse the use and performance of our website and services; and
6. cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
2. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: www.google.com/policies/privacy/.

11. Managing cookies

1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 1. support.google.com/chrome/answer/95647?hl=en (Chrome);
 2. support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
 3. www.opera.com/help/tutorials/security/cookies/ (Opera);
 4. support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);
 5. support.apple.com/kb/PH21411 (Safari); and
 6. privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).
2. Blocking all cookies will have a negative impact upon the usability of many websites.
3. If you block cookies, you will not be able to use all the features on our website.

12. Our details

1. This website is owned and operated by Project Gambia Trust Ridgewood.
2. We are registered in England and Wales under charity number 1160143, and our registered office is at 25 Clark Street, Stourbridge, West Midlands DY8 3UF.
3. Our principal place of business is at 25 Clark Street, Stourbridge, West Midlands DY8 3UF.
4. You can contact us:
 1. by post, to the postal address given above;



2. using our website contact form;
3. by telephone, on the contact number published on our website; or
4. by email, using the email address published on our website.

13. **Data protection officer**

Our data protection officer's contact details are: John Hodt, projectgambia1@gmail.com

14. **Further Information**

Should you have any concerns about the way your information is being handled, please feel free to contact us using the above details. You have the right to withdraw consent for any Personal Data to be stored at any time by contacting our offices on the above details. If you are still unhappy you have the right to complain to the Information Commissioners Office. If you want to learn more about your rights regarding your personal data, you should contact the Information Commissioners office information line on: (0044) 01625 545745 or visit their website at ico.gov.uk.

This policy will be reviewed in January 2024

