

1 Leeds Civic Trust – Privacy Policy

This document sets out Leeds Civic Trust's Privacy Policy as it relates to the storage and use of personal data. The policy will be reviewed formally by the Trust's Council on an annual basis, but may be amended at any time.

1.1 Personal data retained by Leeds Civic Trust

Leeds Civic Trust retains personal data as follows (insofar as it has been provided). This list is intended to be exhaustive but may be added to or amended at any point in time:

- Personal name
- Domestic postal address
- Personal phone number (landline and mobile)
- Email address
- Signature
- Details of any membership subscriptions paid
- Details of any donation made
- Details of any Gift Aid authorities given
- Details of any events attended and payments made
- Details of individual dietary requirements
- Photographs of people

Leeds Civic Trust stores personal data either electronically or physically.

Where the data is stored electronically, this is stored “on the cloud”, and can only be accessed by employees of Leeds Civic Trust and any other Trust members authorised by Council (the Board of Trustees of Leeds Civic Trust). As a minimum, the data is password protected (via a login). Membership information is retained on an access database which is also password protected.

Where data is stored physically (this includes gift aid authorities, paper membership forms, physical attendance lists from events, correspondence), this information is retained in a locked filing cabinet.

Personal information as defined above relates to information in the following five categories:

- Individual members and patrons
- Corporate members (specifically relating to personal data held about the Trust's main contact or contacts at that organisation or their representatives)
- Affiliated society members (generally relating to the Trust's main contact or contacts at the society but may also include their individual members)
- Other people who engage with Leeds Civic Trust
- Participants in research projects (see section 2)

1.2 Retention of personal data

Leeds Civic Trust will not solicit personal data from third parties. All data retained is limited to that which has either been volunteered to us by the party concerned

or in the case of corporate/affiliated society memberships, is provided by someone as a contact point for the organisation. We will retain data on the following basis:

➤ **Individual Members and Patrons**

Leeds Civic Trust will retain personal information obtained from its individual members for as long as the Trust deems it necessary (in conformity with the relevant legislation). In practical terms this will mean:

- Throughout the period that their membership is live

Until the end of the financial year following their membership elapsing For those members whose membership fee is gift aided, the Trust is required by HMRC to retain this information for a period of six financial years after the end of the financial year in which the transaction occurred.

➤ **Corporate members and affiliated societies**

Retention of corporate or organisational information relating to corporate members and affiliated societies falls outside of the scope of this policy, whereas retention of personal information relating to individual members or employees of these organisations is within the scope of this policy.

Where personal data is retained relating to members of these organisations, The Trust will retain this information until the end of the financial year following that date upon which their organisation ceases to be a member of the Trust, following which it will be deleted, unless over-riding legislation requires retention for a longer period.

➤ **Other people who engage with the Trust**

Leeds Civic Trust engages with a wide variety of organisations and individuals both pro-actively and re-actively to fulfil its objectives. This may include information on matters of interest to both parties which may require personal data (usually contact information) to be retained for an extended period of time to enable contact to be maintained.

The Trust will only retain information for as long as it remains relevant.

1.3 Management and disposal of personal data

➤ **Responsibility for Personal Data Management**

Leeds Civic Trust has a named data manager whose responsibility it is to oversee the management of data within the organisation. They report directly to a Trustee with corporate responsibility for data management. To avoid any conflict of interest, this Trustee will not normally be a committee chair. The data manager will ensure that data within the organisation is managed in accordance with this policy.

➤ **On-going Audit of Information Held**

Notwithstanding the specific requirements of this policy, Leeds Civic Trust will undertake a rolling audit of data held, using a data mapping process to demonstrate how we seek to comply with relevant data protection and privacy legislation.

➤ **Staff and Volunteer Training**

We will brief staff and volunteers on different aspects of data management and control to ensure compliance with this policy.

➤ **Accountability**

Leeds Civic Trust's Council (Trustees) will receive an annual report jointly authored by the data manager and the Trustee with responsibility for data management which will outline how this policy is being implemented.

1.4 Opting out of Leeds Civic Trust communications (existing members and patrons as at 25th May 2018)

From 25th May 2018, any individual member or patron will be able to opt out of receiving Leeds Civic Trust communications, and will be able to review and revise the methods of contact we use on an on-going basis.

The Trust communicates with its individual members and patrons in the following ways:

- By post (including monthly newsletter and notice of AGM)
- Via email (including electronic newsletter, reminders about membership, notification of events at short notice)
- By phone including text message (generally used to inform members at short notice – for example event cancellations)

We may also periodically contact members (via post or email) about events organised by others that we think may be of interest (though we will never provide third parties with information about our members). The exception to this rule will be where an event is organised jointly with other organisations. In this instance, the data may be shared to facilitate the effective management of the event (for example, a partner organisation may be responsible for the attendance list)

Members will be informed about how they can opt-out of receiving information on an on-going basis (for example via a signature at the bottom of Trust emails, via our newsletter, online via our website). Any request to opt-out should use the form included as Appendix 1 to this policy, or in an equivalent format.

1.5 Opting into Leeds Civic Trust communications (new individual members and patrons joining after 25th May 2018)

From 25th May 2018 any new member or patron will be able to choose how we communicate with them by opting in to a menu of communication options:

- By post (including our annual newsletter and notice of AGM)

- Via email (including electronic newsletter, reminders about membership, notification of events at short notice)
- By phone including text message (generally used to inform members at short notice – for example event cancellations)

We may also periodically contact members (via post or email) about events organised by others that we think may be of interest (though we will never provide third parties with information about our members).

Lapsed members and patrons who do not re-join until after the end of the financial year following their membership lapsing, will also re-join on the basis of an opt in.

1.6 Opting into Leeds Civic Trust Communications (other people who engage with the Trust)

In relation to non-members who engage with the Trust, the Trust will assume that they do not wish to be contacted by the Trust about any matter that does not relate to the original nature of their engagement with the Trust. We may however seek consent to contact them about other matters which we feel may be of interest to them and will do so by asking them explicitly to opt into receiving such information:

- By post
- Via email
- By phone including text message

We may also seek their permission to contact them (via post or email) about events organised by others that we think may be of interest (though we will never provide third parties with information about our members).

1.7 Information provided to affiliated societies and corporate members

Leeds Civic Trust will contact these organisations by post, email and phone. As organisations, there is no formal requirement for Leeds Civic Trust to obtain and opt-in/opt-out, but such organisations will always have the right to vary the way in which we communicate by mutual consent.

1.8 The rights of individuals whose personal information is retained by the Trust

Anyone has a right to ask the Trust to inform them what personal information is held about them at any time. This information can be obtained either by contacting us by post or via email (office@leedscivictrust.org.uk). This information will be provided within one month of the request being made.

Anyone has the right to correct the personal information the Trust holds about them (or to request amendment). The information will be amended within one month of the request being made.

Individuals have the right to ask for all personal data to be deleted at any time. This will be done within one month of a request being received, unless the Trust believes that there is an over-riding legal requirement for the data to be retained. In those circumstances, the data will be retained and the individual will be informed why their request has been declined.

Individuals may vary the nature and means of communication they receive at any time by notifying the Trust in writing by post or email (office@leedscivictrust.org.uk) – any request must use or replicate the form attached as Appendix 2 to this document.

1.9 Historically significant information

The Trust has the right to retain information that it deems to have potential or actually historical significance. Where personal information is included as part of this information, the Trust will retain the minimum personal information necessary to maintain the integrity of the information concerned, but will not use this personal information for communication purposes.

1.10 Privacy terms

Leeds Civic Trust will always include a paragraph indicating that we communicate in terms of an established privacy policy (see Appendix 3). This information will be included on all email and written communications, and event booking pages.

1.11 Storage of data by third party organisations

Leeds Civic Trust uses a variety of third party systems to manage its activity (these include Eventbrite, Survey Monkey, Doodle Polls). Any data extracted from these systems will then be managed according to this privacy policy. Individuals providing personal information using these platforms will also be subject to the terms and conditions of those platforms.

1.12 Validity of this privacy policy

This current document is an amended version of the privacy policy agreed upon by the Leeds Civic Trust Trustees on the 28th of June 2018. Our Trustees will meet to formally agree on these amendments in June 2021.

2 Research Participant Privacy Notice

2.1 Purpose of this notice

This notice explains how and why Leeds Civic Trust uses personal data for research projects that involve collecting primary data from the general public (who take part as research participants); what individual rights are afforded under the [Data Protection Act 2018](#) (DPA) and who to contact with any queries or concerns.

This information is directed towards research project participants and is intended to supplement the Privacy Policy in Section 1, along with any specific information you may have been provided with when asked to participate in the research. Project specific information will provide details on how and why we will process your data, who will have access to it, any automated decision-making that affects you and for how long we will retain your personal data.

2.2 Why do we process personal data?

Leeds Civic Trust is a public body that strives to benefit the members of our society through working to meet our aims and objectives as a Trust. As such, we may run research projects which are of public interest and require dealing with and processing personal data in our data collection methods.

The DPA requires us to have a legal basis for this processing; we rely upon “the performance of a task carried out in the public interest” as our lawful basis for processing personal data, and on “archiving in the public interest, scientific or historical research purposes, or statistical purposes” as our additional lawful basis for processing special category personal data (that which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, genetic or biometric data, and data concerning health, sex life or sexual orientation).

2.3 How do we follow data protection principles?

- We have lawful bases for processing personal and special category data.
- Data are used fairly and transparently; we will make it clear to individuals what their data will be used for, how it will be handled and what their rights are.
- We only collect and use personal data for our research, for research in the public interest, or to support the work of our organisation.
- We only collect the minimum amount of personal data which we need for our purposes.
- We take steps to ensure that the personal data we hold is accurate.
- We keep your personal data in an identifiable format for the minimum time required for the research project.
- We take steps to ensure that your data is held securely.
- We keep a record of our processing activities.

2.4 What do we do with personal data?

Primary research data can be a very valuable resource for improving public services, raising awareness of issues to governing bodies and gaining a greater understanding of the societies we live in.

When someone is involved as a participant in a research project, they will be informed that generic data collected will be made publicly available on the Leeds Civic Trust website (and related project specific websites and social media platforms) in the form of reports and graphics which may be shared with related local and central government and other organisations, Leeds Civic Trust members and corporate partners. As a default, your personal data however will never be made publicly available, shared, used to contact individuals, or be identifiable in any of the information we share publicly.

There may be instances where a participant is asked specifically whether they are happy to have their name, and/or related organisation, shared publicly alongside the data collected or whether they would prefer to be kept anonymous. In these circumstances, the data will only be made public if you agree that this can happen. For more details about how your data will be used, please contact us for project specific information at office@leedscivitrust.org.uk.

2.5 Your rights as a data subject

Because we use personal data to support qualitative research in the public interest, individuals participating in research do not have the same rights regarding their personal data as they would in other situations. This means that the following rights are limited for individuals who participate, or have participated in, a research project.

- The right to access the data we hold about you.
- The right to rectify the data we hold about you.
- The right to have the data we hold about you erased.
- The right to restrict how we process your data.
- The right to data portability.
- The right to object to us processing the data we hold about you.

2.6 Data security

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

2.7 Retention periods

We will only retain your identifiable personal information for as long as necessary to fulfil the purposes we collected it for; we may then retain your data in anonymised or pseudonymised format.

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

2.8 Communication

In the first instance please contact the researcher who your initial contact was with. You may also contact the Data Protection Officer for further information (see contact details below).

For more information on the law, please see the [Information Commissioner's website](#). You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data.

2.9 Concerns and contact details

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to its Notice, please contact our Data Protection Office – Martin Hamilton – office@leedscivictrust.org.uk.

Or, contact us by post using the following address:

Leeds Civic Trust,
17-19 Wharf Street,
Leeds,
LS2 7EQ

This notice was last updated 28/04/2021

Appendix 1

Leeds Civic Trust Consent Form (“opt out”)

Please complete this form to authorise us to contact you. This should be read in conjunction with the Trust’s privacy policy which can be found on the Leeds Civic Trust website (www.leedscivictrust.org.uk).

Statement	Please tick below to agree to this statement
I have read the Leeds Civic Trust’s Privacy Policy and agree to my personal data being used in the way described, unless I opt out as indicated below:	
Authorisations	Please tick below to OPT OUT
I DO NOT consent to receive information about Leeds Civic Trust’s activities and events, as well as information about events organised by others that Leeds Civic Trust considers may be of interest to you	
You may NOT contact me by email	
You may NOT contact me by post	
You may NOT contact me by telephone or text message*	

*Note, this will normally only be done in an emergency

Photographs:

Leeds Civic Trust may take photographs at events and these photographs may be used in future publicity materials. Given that Trust volunteers and staff may not be able to recognise everyone at an event, we would ask attendees to inform us if they do not wish their photos to be used in this way at the time the photographs are being taken.

I understand that the consents I have detailed above can be changed at any time by notifying the Trust via email (office@leedscivictrust.org.uk) or by post to the above address.

Name

Signature

Date

[Check box for electronic version]

Appendix 2

Leeds Civic Trust Consent Form (“opt in”)

Please complete this form to authorise us to contact you. This should be read in conjunction with the Trust’s privacy policy which can be found on the Leeds Civic Trust website (www.leedscivictrust.org.uk).

	Please tick to confirm
I have read the Leeds Civic Trust’s Privacy Policy and agree to my personal data being used in the way described	
I consent to receive information about Leeds Civic Trust’s activities and events, as well as information about events organised by others that Leeds Civic Trust considers may be of interest to you	
You may contact me by email	
You may contact me by post	
You may contact me by telephone or text message*	

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Name

Signature

Date

[Check box for electronic version]

Appendix 3

Privacy Terms Statement

Leeds Civic Trust is communicating with you in accordance with the terms of its privacy policy, a copy of which can be found at our website (www.leedscivictrust.org.uk/privacypolicy). You can choose at any time to opt out of receiving communications from Leeds Civic Trust by notifying us. The Trust's policy also outlines who you should contact should you have any concerns about how your data is being used. It also confirms your right to examine, amend and request the deletion of personal data we hold (subject to certain restrictions), the circumstances under which we retain your personal information and for what purpose.