

## PRIVACY POLICY

The Jones Family Charitable Trust are committed to protecting and respecting your privacy.

This document (the “**Privacy Policy**”) explains our policy regarding any information you might supply to us when you visit our website at <https://www.jonesfamilycharitabletrust.co.uk> (the “**Website**”) or that you provide to The Jones Family Charitable Trust via another route such as by post or phone. Our goal is to protect your information.

This Website may contain links to other websites, from time to time, which are provided for your convenience. We are only responsible for the privacy practices and security of this Website. We recommend that you check the privacy and security policies and procedures of each and every other website that you may visit.

The Jones Family Charitable Trust is the ‘**Controller**’ (for the purposes of Data Protection Law (currently the UK General Data Protection Regulation and the Data Protection Act 2018) of any personal information that you provide to us through the Website or via another route.

Where The Jones Family Charitable Trust receives your personal information from another company or other organisation, the company or organisation to whom you provide your information will also be a Controller in respect of their use and handling of that information.

This Privacy Policy uses some words with special meanings. These words are identified in bold. If you want to know what any words with special meanings mean, simply scroll back till you find the word in bold, where you will also find the relevant explanation.

### 2. What Information Do We Collect?

The information we collect falls into the following categories (together, the “**Information**”):

- a) Personal information that you provide to us such as your name, address, telephone number, job title or position, date of birth, credit card number, billing address, email address and details of purchasing preferences (“**Personal Information**”), which we use in accordance with this Privacy Policy.
- b) Website Use Information - the Website utilises a standard technology called “**cookies**” and web server logs to collect information about how the Website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at the Website, and the websites visited just before and just after the Website (“**Website Use Information**”). For more information on the cookies that we use and their purpose, please see our [Cookie Policy](#).

We collect and publish information about your health where we have your consent to publicise how a grant has helped you.

We do not collect any other Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### 3. How Is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Personal Information by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
  - create an account on our website;
  - submit an application form to us;
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - analytics providers such as Google;
  - identity and contact data from publicly available sources such as The Office of the Scottish Charity Regulator, The Charity Commission, Companies House and the Electoral Register;
  - A beneficiary charity with which you have a relationship;
  - any person who provides us with a reference or other information about you.

#### 4. How Will We Use Your Information?

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent

Generally, we do not rely on consent as a legal basis for processing your personal data, but where we do, you have the right to withdraw consent at any time.

In some cases, we may need to collect your personal data by law, or in order to perform our side of a contract we have entered into with you or with a view to entering into such a contract. If you fail to provide the requested data, we may not be able to perform under the contract we have with you, or to enter into the contract with you. In such circumstances, we may have to cancel the contract, or be unable to conclude the contract, which means we would not be able to provide the product or service to you. If that is the case, we will notify you of that at the time.

#### 5. Purposes For Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we intend to use your personal data, and the legal basis we will rely upon to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful purpose, depending on the specific purpose for which we are using your data.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>	<b>Retention period</b>
To register you as a new applicant	Identity Contact	Performance of a contract with you	6 years
To process your application including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	Identity Contact Financial Transaction Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)	6 years
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy notice  (b) Asking you to leave a review or take a survey	Identity Contact Application details Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)	6 years
To promote the Trust and its charitable activities through success stories	Identity Photographs Health data	(a) Consent  (b) Necessary for our legitimate interests to promote the charitable activities of the Trust	6 years
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Website use Information	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)	6 years

		(b) Necessary to comply with a legal obligation	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Website use Information	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	6 years

## 6. Disclosure of your information

In the event of the winding up or dissolution of The Jones Family Charitable Trust, we may disclose your personal information to other organisations, including other charities, in order to discharge any obligation owed to you or to dispose of our assets. We may also disclose your information to other charities and their professional advisors where we are considering either a reorganisation or change of legal form of The Jones Family Charitable Trust or an amalgamation, merger or takeover with one or more other charities.

We may also disclose your Personal Information to third parties such as regulators, the police and our professional advisers if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, to enforce or apply our terms and conditions and other agreements, to protect our rights or property or those of our customers or others, or to otherwise assist us in managing the affairs of The Jones Family Charitable Trust. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

Your Information is password-protected to prevent unauthorised access to it. We recommend that you do not divulge your password to anyone.

## 7. Security

We take the security of your Information seriously.

We implement a number of security measures to ensure the safety of any Information in our possession or control. The Information is contained on a secure server, which is accessible only by a limited number of employees who have limited access rights to such information.

We have security procedures in place to protect our customer database from loss and misuse, and only allow access to it when absolutely necessary, and then under strict guidelines as to what use may be made of the Information contained within it.

## 8. Use of your Information outside the United Kingdom

Some of the organisations (including, without limitation, our associated companies and partners) to which we may disclose your Information are situated outside of the UK. Whenever we transfer your personal data

out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government.
- Where we use certain service providers, we may use specific contracts approved by the Information Commissioner which give personal data the same protection it has in the UK.
- Where we use providers based in the US, we may transfer data to them if they are part of the UK Extension to the EU-US Data Privacy Framework which requires them to provide similar protection to personal data shared between the UK and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **9. Policy for Children**

We realise and understand that children may visit the Website, or interact with The Jones Family Charitable Trust via another route, but encourage all persons under 13 to consult with their parents or legal guardian before submitting any content or information to The Jones Family Charitable Trust. Parents or legal guardians should, in particular, supervise children when online and recommend that parental control tools be put in place.

## **10. Changes to this Privacy Policy**

We aim to meet high standards and our policies and procedures are, therefore, constantly under review. From time to time we may change our security and privacy policies. Accordingly, we recommend that you check this page periodically, or request a copy of the current Privacy Policy from our Secretary, in order to keep up to date.

## **11. Updating and Correcting Information**

You may correct the Information we hold about you by changing your profile preferences online or by contacting the Secretary (see contact details below). Please include your name, address, and/or email address when you contact us. We encourage you to update your Personal Information promptly if it changes.

## **12. Your Rights to Access Your Information**

As an individual, you have the following rights as a data subject under Data Protection Law in relation to the processing of your personal data:

- Request access to your personal data (a data subject access request), which enables you to receive a copy of the personal information we hold about you and the check that we are lawfully processing it.
- Request correction of the personal data that we hold about you, to have any incomplete or inaccurate information corrected.
- Request erasure of your personal data, so that we delete or remove personal data where there is no good and lawful reason for us to continue to process it (although in some cases we can refuse this request where we can claim exemptions as a Controller).

- Object to processing of your personal data where we are processing your personal data for direct marketing or where we are relying on a legitimate interest (of a third party) and there is something specific to your particular situation which gives rise to your objection.
- Request the restriction of processing of your personal data, through the suspension of our processing, e.g. where you want us to establish its accuracy or the reasons for the processing.
- Request the transfer of your personal data to another party in an easily portable format.

### **13. How to Contact Us**

If you would like any further information or have any comments about our use of your Information, our Privacy Policy or any aspect of the Website or our service, please contact our Secretary by any of the methods shown below:

Contact us

Email: [Audrey.Souness@andersonstrathern.co.uk](mailto:Audrey.Souness@andersonstrathern.co.uk)

Telephone: 0131 625 8168

Post: The Secretary, The Jones Family Charitable Trust, Anderson Strathern LLP, 58 Morrison Street, Edinburgh EH3 8BP