

# The “No Way” Trust Limited

## Privacy and Cookies Policy

### 1. Introduction

We operate this Privacy and Cookies Policy because we are committed to safeguarding the privacy of those using our website and the confidentiality of any information that we collect about you.

This Privacy and Cookies Policy sets out how we will use personal data that we may obtain from you. It applies whenever you submit your personal data to us in accordance with section 3. If we change any of the terms of our Privacy and Cookies Policy we will post the revised policy on our website behind the “**Privacy and Cookies Policy**” link at the bottom of each page.

We are committed to ensuring that all personal data we hold is treated properly and in accordance with applicable data protection legislation (including but not limited to the Data Protection Act 2018 and the General Data Protection Regulation). In accordance with data protection legislation, we are required to explain to you how we will treat any personal data which we collect from or about you.

### 2. Who are we?

We are The “No Way” Trust Limited (a registered charity in England and Wales (1049059), Scotland (SC040325) and a company limited by guarantee in England (02953857)). Our registered office is The Deep Business Centre, Tower Street, Hull, HU1 4BG. We are the controller in respect of all personal data collected via our website (www.pmnw.co.uk). We are registered as a controller with the Information Commissioner’s Office (“**ICO**”) and our registration number is Z9482221.

### 3. When do we collect personal data about you?

You may give us information about you when you:

- contact us by any means (including via the website, over the phone, by email or by post) with enquiries, complaints etc.;
- sign up for one of our events, book a programme with us or ask us to provide any services to you;
- make a donation;
- purchase our products;
- register as a volunteer
- engage with us on social media;
- choose to complete any surveys or research we send you;
- provide us with any feedback;
- complete any surveys or participate in any interviews or focus groups;
- participate or make enquiries in relation to any grant opportunities; or
- fill in any online forms.

When you use our website, we collect your personal data using “cookies” and other tracking methods. Further details in respect of this are set out below.

If you provide us with personal data about someone else you are responsible for ensuring that you comply with your obligations under data protection legislation in respect of such disclosure.

### 4. What personal data do we collect about you and why?

#### 4.1 Feedback, Surveys and Focus Groups

If you wish to provide feedback in relation to our workshops and programmes or participate in any surveys or focus groups we may ask for your name, school, year group, age, gender, position, the workshop/programme you attended and your comments. By submitting your feedback you are giving us consent to use your feedback in order to monitor and review our services and (if stated) to enter you into a prize draw. You may withdraw your consent at any time in accordance with section 7 below, however if you withdraw your consent we will not be able to enter you into the prize draw. Please also note that this will not be possible where we have anonymised your comments and feedback.

## **4.2 Grant Opportunities**

Where it is in our legitimate interest to do so, we may collect information about potential grant makers when researching grant opportunities including information obtained through any correspondence that may transpire.

## **4.3 Volunteers and Workers**

If you apply to become a volunteer or to work with us, we will process such information as is necessary for us to process your application and assess your suitability for the role (such information may include personal data such as like your name, contact information, employment status, information contained within your CV and on any application form and previous experience). You may also be asked to complete an enhanced DBS check.

When you submit your information to us you are giving us your consent to process your personal data for the purposes of considering you for the relevant role and for contacting you in relation to that role. You may withdraw your consent at any time in accordance with section 8 below, however if you withdraw your consent we will not be able to consider you for the relevant role. If you are subsequently appointed to the relevant role your personal data will be processed in accordance with our data protection policy, which will be provided on appointment.

## **4.4 Partners**

If you are one of our partners (for example, one of the secondary schools or other youth organisations that we work with) we may process personal data such as your work contact details, employer organisation, address, email address, telephone number(s) and details of your interactions with us where it is necessary for the performance of a contract we have with you or your organisation, where it is necessary for our or your legitimate interests (for example, to respond to your enquiry and provide you with any information requested and to administer and deliver our programmes and services) or where you have given us consent to process your personal data for the relevant processing activity.

## **4.5 Enquiries**

If you have contacted us by any means with any enquiries or complaints we will process your personal data (such as your name, social media handle, contact details and any other information provided) where it is necessary for our legitimate interests in order to provide an appropriate response to your enquiry or complaint. We may also keep a record of our communications with you where it is in our legitimate interests to do so in order to inform any future communication we have with you and to demonstrate how we communicated with you throughout.

## **4.6 Orders and Donations**

If you place an order with us or make a donation you may be asked for personal data such as your name, contact information, bank account and payment card details and whether you are able to Gift Aid any of your

donations. We will only process your personal data to the extent necessary for the performance of a contract with you or where it is necessary in our legitimate interests. We may share your personal data with third parties who help us to process payments/donations and claim Gift Aid

#### **4.7 Marketing**

We may use personal data such as your name and contact information to provide you with marketing information regarding our programmes and workshops and other news and updates in relation to The “No Way” Trust Limited which we believe may be of interest to you. We will only send such marketing material if you have given us consent (where consent is required) or where it is in our legitimate interests to do so (for example, to promote our programmes and workshops and where legally permitted to do so).

If you decide that you do not wish to receive any marketing communications from us, please see section 7 below.

#### **4.8 Use of our Website**

We may automatically collect data about you such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website as you interact with our website. We collect this data by using cookies and other similar technologies. We will use the data collected where it is necessary for our legitimate interests (for example, to keep our website updated and relevant). Please refer to section 9 for further information regarding the cookies used on our website.

If we require your information for the purposes of performing a contract with you and you fail to provide this information, or if the information you provide is not accurate, we may not be able to perform the contract we have or are trying to enter into with you.

You warrant that any information you supply to us is accurate and up to date, that you will inform us if any such information requires updating.

We will not sell any of your personal data to any third party.

### **5. Who do we share your personal data with?**

We may share personal data about you:

- with third parties, who are directly involved in dealing with any request or enquiry made or order placed by you;
- with service providers acting as processors who provide IT and system administration services;
- where such disclosure is required by law;
- with third parties who are providing us with professional advice;
- where the disclosure is in connection with any criminal investigation, legal proceedings or prospective legal proceedings where permitted by law;
- where the disclosure is in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); or
- where we have stated or informed you otherwise (e.g. in this policy or on our website);

We will not pass on your information to any third party for the purpose of marketing.

We may also share your personal data with third parties in the context of the possible sale or restructuring of the charity. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

## **6. Security and International Transfers**

We will take all reasonable steps to protect your personal data. However, the Internet is global and no data transmitted via the Internet can be guaranteed by us to be completely secure during transmission. We cannot guarantee the security of any data that you disclose online and we will not be responsible for any breach of security unless this is due to our negligence or wilful default.

Our website is hosted in the UK and all data provided to us is stored within our servers located in the UK. Sometimes we may need to transfer personal data we collect from you to third party data processors in countries that are outside the EEA - for example, this might be required in order to fulfil your order, process your payment details or provide support services. If we do this we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is in place:

- The transfer is to a third party located in a country that has been deemed to provide an adequate level of protection for personal data by the European Commission.
- The transfer is subject to use of a contract approved by the European Commission which gives personal data the same protection it has in Europe.
- The transfer is to a third party based in the US which is part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

In the absence of an adequacy decision in respect of the relevant country, or appropriate safeguards as detailed above, we will not transfer your personal data outside of the EEA unless we have a lawful basis for doing so (for example, because you have explicitly consented to the proposed transfer).

## **7. What are your rights?**

If we are sending marketing materials to you by any means, you may ask us to stop sending such marketing materials at any time. If you wish to object to us sending you marketing material just send your request by email to [info@pmnw.co.uk](mailto:info@pmnw.co.uk), or by writing to us at The Deep Business Centre, Tower Street, Hull, HU1 4BG.

You have a legal right to see a copy of the personal data that we keep about you (commonly referred to as a "subject access request"), subject to certain exemptions. If you wish to make a subject access request, please contact us using the details set out above.

In some circumstances you may also have a right to:

- rectify or erase any personal data we hold about you;
- restrict our processing of your personal data;
- object to us processing your personal data (for example, where we are processing your personal data based on our legitimate interests, you can ask us to stop processing your personal data. We must then

do so unless we believe we have a legitimate overriding reason to continue processing your personal data);

- data portability in respect of your personal data.

In accordance with applicable data protection legislation, we follow security procedures when we process your personal data. We may therefore request proof of your identity before disclosing certain information to you or acting on any requests pursuant to this section 7.

Please contact us using the above contact details if you have any reason to believe that information we hold about you is inaccurate.

## 8. How long do we retain your personal data?

We only retain your personal data for as long as we need it for the purpose for which it was collected. Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time we retain your personal data; consider the purpose or purposes for which we hold your personal data for in deciding whether (and for how long) to retain it; securely delete your personal data if it is no longer needed for such purpose or purposes; and update, archive or securely delete your personal data if it goes out of date. For further information on how long we retain your personal data please contact us using the contact details set out in paragraph 7 above.

## 9. Cookies

Our website uses “cookies” to ensure you receive the best possible visitor experience. Cookies are small files which are sent by a web server to an individual’s computer which are then stored on that computer’s hard drive. A cookie contains text, and is like an identification card which can only be translated by the server it originated from.

Cookies cannot tell us information such as your email address, which we can only collect where you tell us, for example if you submit an enquiry to us.

Our website uses the following cookies for the following purposes:

Cookie Name	Cookie Description
Cookie Consent	Stores the user's cookie consent state for the current domain
PHPSESSID	Preserves User session state across page requests
VUID	Collects data on the user's visits to the website, such as which pages have been read

Most internet browsers allow you to prevent cookies being stored on your computer. Alternatively you may be able to configure your browser to accept all cookies or to notify you when a cookie is offered by our server. You may also be able to delete all cookies currently stored on your web browser.

Therefore unless you change your browser settings you will automatically accept cookies from our website.

We may also collect information about where you are on the Internet (e.g. the URL you came from, IP address, and domain types like .co.uk and .com), your browser type, the country where your computer is located, the pages of our website that were viewed during your visit and any search terms that you entered on our website. We will use this information to administer our website, for internal operations (including

troubleshooting, data analysis, testing, research, statistical and survey purposes) and as part of our efforts to keep our website safe and secure.

For further information about cookies and how they are used, please visit [www.aboutcookies.org](http://www.aboutcookies.org).

**10. What about third party websites that you can access via our website?**

Our website contains links to other websites which are outside our control and are not covered by this Privacy and Cookies Policy. If you access other websites using the links provided, the operators of those websites may collect personal data from you which will be used in accordance with their respective privacy policies which you should read. We are not liable for the practices of such third party website operators in respect of your personal data.

You acknowledge that any information that you post using our social media facilities will be viewable by anybody who visits those websites and that such information is also subject to the relevant provider's privacy policy. You are advised to consult each such privacy policy to see how they will use your data.

**11. What if I want to complain about how you are handling my information?**

You have the right to lodge a complaint with your local data protection authority (the Information Commissioner's Office in the UK) if you have any concerns with regard to the way in which we process your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the data protection authority so please contact us in the first instance. You can contact us by emailing us at [info@pmnw.co.uk](mailto:info@pmnw.co.uk), or by writing to us at The Deep Business Centre, Tower Street, Hull, HU1 4BG.