

WAKEMAN TRUST

DATA PRIVACY NOTICE

THE PURPOSE OF THIS PRIVACY NOTICE

This privacy notice gives you information about use of your personal data by the Wakeman Trust. We may need to update this privacy notice from time to time.

DATA CONTROLLER

The Data Controller is the Trustees of the Wakeman Trust (“the Trustees”).

The Trustees have appointed a data privacy manager who is responsible for overseeing the collection and processing of personal data by the Wakeman Trust (“the Trust”), including questions arising from this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights as set out below, please contact the data privacy manager using the details below.

CONTACT DETAILS

Mailing address: Data Privacy Manager
Wakeman Trust
38 Walcot Square
London
SE11 4TZ

Email address: DataManager@wakemantrust.org

Telephone number: +44 (0)20 7840 1968

PERSONAL DATA

Personal data is information relating to an identified or identifiable living individual.

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Our use of personal data is lawful where it is necessary for:

- The performance of a contract that we have with you
- Compliance with a legal obligation to which we are subject
- The purposes of legitimate interests that we pursue, except where such interests are overridden by your interests or fundamental rights and freedoms

The purposes of our legitimate interests include: (i) the fulfilling of our charitable objective of publishing and distributing Christian literature and (ii) complying with our legal obligations.

Some special categories of personal data may only be processed lawfully where certain additional conditions are satisfied. As a not-for-profit body with a religious aim we process such categories of data in the course of our legitimate activities solely in relation to persons who have regular contact with us.

FAILURE TO PROVIDE OR UPDATE DATA

It is important that the data we hold about you is accurate and current. Please keep us informed if there are any changes.

We may be unable to keep in contact with you or to perform contractual obligations to you if your data is not kept up-to-date.

DISCLOSURE OF YOUR PERSONAL DATA

We will not disclose your personal data to any external third party except:

- With your consent or
- For the purposes of processing payments, or
- Where we are required to do so by law, or
- As stated below in INTERNATIONAL TRANSFER OF DATA

INTERNATIONAL TRANSFER OF DATA

We fulfil orders received from customers in North America from stock held in Ohio and it is therefore necessary for us to pass names, addresses and details of orders of North American customers to our mailing agents in Ohio for the purpose of fulfilling our contracts with those customers.

There is no relevant adequacy decision of the European Commission in respect of this transfer of data.

DATA SECURITY

We have put in place appropriate measures to prevent your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those of our trustees, volunteers, agents and contractors who have a need to know. They will only process your personal data on our instructions and they are under a duty of confidentiality.

Data protection laws in the USA may not be as comprehensive as in the UK. However, we have a written agreement with our mailing agents in the USA under which they will deal with our North American customers' personal data appropriately so as to keep it confidential and secure.

DATA RETENTION

We will retain your personal data for as long as is reasonably necessary for the operation of the Trust and in order to comply with legal requirements for the retention of certain data.

Debit or credit card details provided to us for the purposes of making a payment are deleted or destroyed as soon as the payment has been processed.

If you do not make any purchases from us for a period of seven years we will delete all your personal data that we hold.

In some circumstances you can ask us to delete your data (see **erasure request** below).

In addition to your legal right to request erasure you can ask us to delete information we hold about you at any time. We will review any such request and unless there is some legal reason for us to retain the information we will delete it. If you ask us to delete your data at a time when we still have outstanding contractual obligations to you we may be unable to fulfil those obligations.

YOUR LEGAL RIGHTS

Unless subject to an exemption under relevant legislation you have the following rights in respect of your personal data:

- The right to **request a copy** of your personal data which we hold
- The right to **request correction** of any personal data that is inaccurate, incomplete or out of date
- The right to **request transfer** of your data to another person (data portability)
- The right to **request erasure** of your personal data where it is no longer necessary for us to continue processing it, where you have successfully exercised your right to object to processing, where we have processed your data unlawfully or where the law otherwise requires your data to be erased

- The right to **object to processing** of your personal data where you consider that your interests or personal rights and freedoms override our legitimate interests described above
- The right to **request restriction** of processing where you have disputed the accuracy of the data or the lawfulness of the processing, or where you wish us to retain data that we would otherwise delete

Your right to request transfer of your data to another person applies to data that you have provided to us and that we process by electronic for the purpose of a contract that we have with you.

Information that you have given us for the purpose of a contract that we have with you consists of your name, contact details and the goods or services requested. It is held in manual records and an OMNIS database. While we will endeavour to provide such data we are not able to develop systems to enable it to be transferred automatically in a machine readable format.

Before responding to a request or objection we may need to request specific information from you as a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it.

You will not have to pay any fee to exercise these rights. However, we may charge a reasonable fee for, or may refuse to comply with, any request that is clearly unfounded, excessive or repetitive.

We try to respond to all requests within one month. If it will take longer because your request is complex we will notify you and keep you updated.

You also have the right to lodge a complaint with the Information Commissioners Office on 0303 123 1113, or via email at <https://ico.org.uk/global/contact-us/email/> or at Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

*Version issued
May 2020*