



## Privacy and Data Protection Policy

### Privacy Policy

The Cole Charitable Trust acts as the data controller for any data held by the Trust.

The Cole Charitable Trust asks for contact information from each applicant. The information requested includes a contact name, email address, address for correspondence and a telephone number. The data received are considered personal data if they can be used to identify an individual (e.g. sam.smith@xyzcharity.org.uk) but not if they are generic to the charity (info@xyzcharity.org.uk).

The personal data held will be used to contact the applicant regarding their request for a grant on a legitimate interest basis.

The paper records of personal data will be held for six years, and computer data will be held for the life of the Trust as archives. Archived data are not actively processed.

You have a right to request what data the Trust holds, and individuals can have their personal information removed from the database if requested. Please contact [thecoletrust@gmail.com](mailto:thecoletrust@gmail.com) with any requests.

### Website privacy policy

The Cole Trust is committed to protecting our visitors' privacy and does not sell, rent, loan, or otherwise share any information about them.

Like all organisations with a website, we receive standard tracking data when you visit our site. Information from your browser, including your IP address, pages visited, the length of time you spend on our site, and files you download is recorded in our website server logs. We use and analyse these data to develop site content. However, no personal information is collected during the tracking process. We do not sell, rent, loan or otherwise share any personally identifying information or information of any kind that a user provides.

The Cole Trust provides links to external websites. Unless we expressly state otherwise, we make no representations whatsoever concerning the content or privacy policies of those sites.

### Legitimate Interest Assessment

Personal data of applicants held by the Cole Charitable Trust includes names, email address, postal addresses and telephone numbers of individuals. Specifically, names are held for contacts at charities that have applied to the Trust. Email addresses are considered personal data if the address contains a person's name and the name of the charity. The postal address is considered personal data if a home address is used as a

contact address. The telephone number is considered personal data if a personal telephone number (not the charity's number) has been provided.

#### Identify the legitimate interest

There is a legitimate interest for both the applicant and the Cole Charitable Trust for the Trust to hold personal data. The data are provided by the applicants on the application form. The data are used only to contact the applicants either with queries about their application or to inform them of the outcome of their application.

#### Apply the necessity test

It is necessary to hold personal data for the contact of the applicant in order to direct queries or responses to the correct person. In instances where a home address has been provided as the postal address, it is vital to retain that information in order to send grants to the applicant.

#### Balancing test

The data held by the Cole Charitable Trust are not particularly sensitive or private. The applicants have provided their preferred contact information on the application form, and the information is only used to contact them about their application. The data are not shared with anyone outside the Cole Charitable Trust.

For further information about data privacy, please see <https://ico.org.uk/>

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