

TECTONA TRUST LTD
and
SAILING TECTONA CIC

Data Privacy Policy

Draft 29th January 2019

INTRODUCTION

Tectona Trust Ltd is a registered charity whose objectives are to help people of all ages to develop and become mature and responsible individuals through experience of sail training activities in traditional sailing craft, including maintaining and conserving the craft, such people to include the socially disadvantaged and those suffering mental health and addiction problems.

To help achieve these objectives, Tectona Trust owns the sail training vessel Tectona and has an associate company Sailing Tectona CIC, (a community interest company), which operates Tectona and carries out other related activities.

The two companies are legally separate entities, each with its own Board of Directors, but who liaise closely.

ABOUT THIS POLICY

This policy explains when and why the two companies collect and use personal information, keep it secure and your rights to it.

We reserve the right to change this policy without prior notice.

We will always comply with the General Data Protection Regulations (GDPR) when dealing with your personal data. Details of the GDPR can be found on the website of the Information Commissioner www.ico.gov.uk For the purposes of the GDPR, Tectona Trust Ltd and Sailing Tectona CIC is each separately the “controller” of personal information held by the respective company.

WHO ARE WE?

Tectona Trust Ltd is a registered charity whose registered address is
c/o Cattewater Harbour Commissioners, 2 The Barbican, Plymouth, PL1 2LR
E-mail address.....

Sailing Tectona CIC is a community interest company (CIC) whose registered address is
March House, Cliff Road, Wembury, Plymouth, PL9 0HN
E-mail address.....

WHAT INFORMATION WE COLLECT AND WHY

Tectona Trust Ltd

Type of information	Purposes	Legal Basis of Processing
Name, address, telephone numbers, e-mail address of donors, supporters & enquirers	Promulgating information about the charity. Fund-raising.	For progressing our charitable objectives and legitimate interests.
Name, address, telephone numbers, e-mail address, profession, date of birth, nationality, of Directors and Officers of Tectona Trust Ltd	Managing the company. Notification to Companies House & the Charity Commission.	To fulfil the legal obligations of the company.
Details of payments by donors.	Managing finance.	For the purposes of our legitimate interests in operating the charity.

Sailing Tectona CIC

Type of information	Purposes	Legal Basis of Processing
Name, address, telephone numbers, e-mail address of donors, supporters, volunteers, enquirers, clients & participants in our voyages & activities.	Promulgating information about the company and its activities. Managing voyages & activities Fund-raising.	For progressing our community interest company (CIC) objectives and legitimate interests.
Age, medical conditions, medications, special requirements of participants in our voyages and activities.	So we can properly organise and manage our activities, having regard to individual circumstances.	To fulfil our duty to provide due care to participants.
Contact details of parents, carers, next of kin of participants in our voyages and activities	So we can provide prompt advice on any issue regarding the well-being of the participants, changes in the planned activity and other circumstances.	To fulfil our duty to provide due care to participants.
Photos and videos of participants in our voyages and activities.	Publishing on our website and social media, and using in press releases.	We will seek consent for this when arranging voyages and activities. Such consent may subsequently be withdrawn.
Name, address, telephone numbers, e-mail address, profession, date of birth, nationality, of Directors and Officers of Sailing Tectona CIC.	Managing the company. Notification to Companies House.	To fulfil the legal obligations of the company.
Name, address, telephone numbers, e-mail address, bank account details of clients & donors.	Managing finance. Monitoring of monies received.	For our legitimate interests in operating the company.
Name, address, telephone numbers, e-mail address, bank account details, of suppliers & contractors. Details of goods & services provided.	Paying approved invoices.	To comply with our contractual obligations.
Name, address, telephone numbers, e-mail address, National Insurance number, bank account details of employees.	Paying salaries. Reimbursing approved expenses.	To comply with our obligations under contracts of employment.
Name, address, telephone numbers, e-mail address, bank account details of volunteers	Reimbursing approved expenses	For our legitimate interests in operating the company. To comply with our policy regarding volunteers.
References and Enhanced Disclosure & Barring Service Check for the Welfare Officer & persons regularly instructing, coaching or supervising young people and vulnerable adults.	Safeguarding children & vulnerable adults.	To comply with our Safeguarding Policy, with The Children Act 1989 & with regulatory requirements regarding vulnerable adults.

HOW WE PROTECT YOUR PERSONAL DATA

We will not transfer your data to any other party without your consent.

We implement generally accepted standards of technology and operational security in order to protect personal data. In particular, our bank does not on a routine basis advise us via our bank statements of the sort code and account number of payments received and we do not hold a data base containing such information. Please note however that:

- Data transmitted over the internet or by e-mail can never be guaranteed.
 - The majority of data processing is undertaken on personal computers and electronic devices.
- Nevertheless, although as with any other similar organisation we cannot give an absolute guarantee of data security, we do believe that the risk of a breach is as low as reasonably practicable.

In the unlikely event of a breach of your personal data, we would notify you promptly.

WHO ELSE HAS ACCESS TO THE INFORMATION?

We will not share your data with any third parties without your prior consent. Furthermore we do not envisage making such a request other than in unusual and rare circumstances.

The details of the Directors and Company Secretary of Tectona Trust Ltd and Sailing Tectona CIC are provided to Companies House, and, for Tectona Trust Ltd, to the Charities Commission. These details are publicly available via the government websites.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will retain your data for as long as we believe you have an interest in Tectona and our activities. However you may request us at any time to remove it.

YOUR RIGHTS

You have rights under the GDPR:

1. To access your personal data.
2. To be provided with information about how your personal data is processed.
3. To have your personal data corrected.
4. To have your personal data erased in certain circumstances.
5. To object to or restrict how your personal data is processed.
6. To have your personal data transferred to yourself or to another business in certain circumstances.

You have the right to take any complaints about how we process your personal data to the Information Commissioner.

Please address any questions, comments or requests regarding data processing to the Company Secretary of Tectona Trust Ltd whose contact details can be found on the website of Companies House.