



filanthropiaconsulting

for charities and not for profit organisations

Privacy Policy

This Privacy Policy sets out how Filanthropia Consulting Limited, registered in England and Wales with company number 8812064 and whose registered office is at Heath House, Alldens Lane, Godalming, Surrey GU8 4AP (“**Filanthropia Consulting**”, “**we**” or “**us**”), collects, stores and uses information about you.

This Privacy Policy is effective from 25 May 2018 and as amended 16 January 2020.

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Company number 8812064. Registered in England and Wales. Registered office as above.



1 Data controller

In respect of the processing described in this Privacy Policy, the data controller for the purposes of the General Data Protection Regulation EU 2016/679 (“**GDPR**”) and the Data Protection Act 2018 is Filanthropia Consulting.

Filanthropia Consulting is registered with the Information Commissioner’s Office under reference number ZA621280.

2 How we collect or obtain information about you

We may collect your personal data or you may provide it to us through various means including information:-

- you provide to us (a) when we meet, and/or (b) you communicate to us by telephone, post, email or other forms of electronic communication;
- about you provided to us by your organisation, advisers, intermediaries. agents or regulatory or statutory bodies;
- collected when you complete (or we complete on your behalf) client engagement formalities or register for an event;
- drawn from publicly available sources (including, but not limited to the Charity Commission for England and Wales (“**Charity Commission**”) and Companies House; and/or
- collected otherwise in the normal course of providing all or any of the services (as summarised on the home page of our website www.filanthropia.co.uk) (“**Services**”).

3 Information we collect

We may collect the following personal data about you:-

- your name (and any former names) and contact information such as your home and/or business address, email address and telephone number;
- identity and biographical information including your nationality, date of birth, tax status, passport/national identity card details and country of domicile, your employment and employment history, job title and role and other information relevant to the provision of our Services;
- information in relation to your financial situation including, but not limited to, income, expenditure, assets and liabilities;
- an understanding of your goals and objectives and other information provided to us in connection with our provision of the Services; and/or
- information about our meetings and/or our telephone conversations with you.



4 Sensitive personal data

Sensitive personal data (referred to as “special category data” in the GDPR) includes information about an individual that reveals his/her racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health and sexual life and/or data relating to criminal convictions and offences (“together **“Sensitive Personal Data”**”).

Our provision of Services may from time to time require us to process Sensitive Personal Data including, but not limited to, data relating to criminal convictions and offences in respect of charity trustees, employees and volunteers.

5 How we use your information

How we use your personal data will depend on various factors including whether you are a client, a representative of a client, a business contact, someone whose personal data we necessarily process as part of the provision of our Services or otherwise. We may, therefore, process your personal data for one or more of the following purposes:-

- providing a (written and/or verbal) proposal to you or your organisation in relation to our Services and for client engagement purposes (including the carrying out of background checks);
- providing our Services to you and/or our clients;
- managing our relationship with you and/or our clients (including billing and financial management), for record-keeping purposes and more generally for the proper operation of Filanthropia Consulting;
- dealing with any complaints or feedback you may have;
- monitoring and improving the performance and effectiveness of our Services;
- the purposes set out in section 14 (Our communications) below;
- seeking advice on our rights and obligations, such as where we require our own advice and to exercise and defend our legal rights;
- compliance with our legal and regulatory obligations, such as data protection and reporting requirements and/or to assist with investigations by police and/or other competent authorities and regulators including, but not limited to, the Charity Commission; and/or
- safeguarding the security of our systems and communications.

6 Lawful basis for processing your personal data

We may process your personal data for any of the purposes set out in section 5 above where one (or more) of the following lawful grounds applies:-

- the processing is necessary to perform a contract with you, or to take steps at your request before entering into a contract with you;
- the processing is necessary for us to comply with our legal obligations;



- the processing is necessary for our legitimate interests (including the operation of Filanthropia Consulting and the provision of Services) or those of any client or relevant third party, unless those legitimate interests are overridden by your interests or fundamental rights or freedoms; and/or
- you have consented to the processing in question.

Where we process Sensitive Personal Data, other lawful grounds may apply, such as where you have given us your explicit consent; that the processing is necessary for the establishment, exercise or defence of legal claims; or for reasons of substantial public interest. It is anticipated, however, that in most cases we will rely on having obtained an individual's explicit consent.

7 Disclosure of your information to third parties

Only to the extent necessary to run our business, to provide the Services, to fulfil any contracts we enter into with you and/or where required by law or to enforce our legal rights we may share information with:-

- your organisation;
- with our client in the particular matter;
- third parties we engage to assist in providing our Services, such as lawyers (including barristers), other professional services firms, IT and other consultants, public relations advisers, translators and/or couriers;
- intermediaries to whom we introduce you;
- our own legal and professional services providers and insurers, where appropriate;
- third parties and their advisers in the event of the potential or actual sale or purchase of all or part of our business or assets (or any other business or assets), subject to appropriate obligations of confidentiality; and/or
- Courts and other authorities in connection with the enforcement or defence of legal rights and provision of our Services.

8 Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event): NO

9 How long we retain your information

We will retain your personal data for no longer than necessary. In many cases this will mean that we shall retain your personal data for the same period that we retain your files or a copy of your files - usually six years from the date upon which a relevant matter came to an end. We will also take into account:-

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);



- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and/or
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

10 How we secure your information

The security of your personal information is important to us. We strive to ensure that your personal data is secure by using appropriate technical and organisational measures such as storing your information on secure servers. However, it is important to remember that no method of electronic storage is 100% secure and we cannot guarantee its absolute security. Should there be any breach of the security of your personal data, we will inform you within 72 hours of our knowledge of any such breach.

11 Use of cookies and similar technologies

We do not use cookies on our website.

12 Transfers of your information outside the European Economic Area

Our provision of the Services may require us to transfer your personal data to countries outside the European Economic Area which may not provide the same level of data protection as within it.

We ensure that any such transfer meets the requirements of GDPR, for example because it is necessary for the provision of our Services to you; or for the establishment, exercise or defence of legal claims; or it is otherwise subject to prescribed safeguards such as model clauses approved by The European Commission.

13 Use of automated decision making and profiling

We do not use automated decision making and/or profiling.



14 Our communications

We may use your contact details to send you (by post or electronically) briefings, newsletters, event invitations and other information relevant to the charities and not for profit sector. We do so on the basis of our legitimate interests or your consent (as appropriate to the communication in question and all other circumstances). You can always unsubscribe from these mailings by clicking on the link in the relevant email or by contacting us (details at paragraph 17 below).

15 Your rights in relation to your information

Under GDPR you have the right:-

- to access your information and to receive information about its use;
- to have your information corrected and/or completed;
- to have your information deleted;
- to restrict the use of your information;
- to receive your information in a portable format;
- to object to the use of your information;
- to withdraw your consent to the use of your information; and
- to complain to the Information Commissioner's Office ("ICO"), which can investigate compliance with data protection law and has enforcement powers, if you are not satisfied with how we are processing your personal data.

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the GDPR, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Please contact us in writing using the contact details at paragraph 17 below if you would like to action any of your rights above.

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.



How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

16 Changes to this Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

17 Our details

If you have any queries about this Privacy Policy or how we process your personal data you can contact us by post to Sarah Chiappini (our data protection officer): at Heath House, Alldens Lane, Godalming, Surrey GU8 4AP or by sending an email sarah@filanthropia.co.uk.

18 Copyright and credit

This Privacy Policy is based on a GDPR compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.