STILE ANTICO FOUNDATION

DATA PROTECTION POLICY

1. ABOUT THIS POLICY

During the course of our activities we, the Stile Antico Foundation (“the Foundation”, Registered Charity no. 1156615), will process personal data (which may be held on paper, electronically, or otherwise) about you, the Friends, donors and other supporters of Stile Antico (“the Supporters”) and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the UK Data Protection Act 2018 and the UK General Data Protection Regulation. The purpose of this policy is to make you aware of how we will handle your personal data.

2. DATA PROTECTION PRINCIPLES

2.1 We will comply with the following principles. Personal data will be:
(a) Processed fairly, lawfully and transparently.
(b) Processed for limited purposes and in an appropriate way.
(c) Relevant and not excessive for the purpose.
(d) Accurate.
(e) Not kept longer than necessary for the purpose.
(f) Processed in line with individuals' rights.
(g) Secure.

2.2 "Personal data" means recorded information we hold about you from which you can be identified. "Processing" means doing anything with the data such as accessing, disclosing, destroying or using it in any way.

3. HOLDING AND USING DATA

3.1 We will only process your personal data where you have given your consent.

3.2 We will never ask Supporters for sensitive personal data such as religious beliefs.

3.3 When Supporters make donations using the Charities Aid Foundation (CAF) the reports we receive from CAF contain all or some of the personal data you supplied them when you set up the arrangement.

3.4 Some Supporters contribute regularly by means of standing orders and Gift Aid forms. We share this data with your bank and HMRC.

4. HOW WE ARE LIKELY TO USE YOUR PERSONAL DATA

We will process the data you have provided for administrative and management purposes (in particular, administration of the Stile Antico Friends scheme). The Stile Antico Foundation shares data with the Stile Antico Group under a confidentiality agreement. (This Data Sharing Agreement is available for your information on request).

We will only process your personal data for the specific purpose of administering charitable donations, including the Stile Antico Friends scheme (“the Purpose”). Your personal data will only be processed to the extent that it is necessary for the Purpose.

5. ACCURATE DATA.

We will take reasonable steps to keep the data we store about you accurate and up to date. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you so that we can make the necessary amendments.

6. DATA RETENTION

We will not keep your personal data for longer than is necessary for the Purpose. This means that data will be destroyed or erased from our systems when it is no longer required; this may be the case, for example, if you decide not to continue your philanthropic support or membership of the Friends scheme and cease to engage with the Stile Antico Foundation and Group.

7. PROCESSING IN LINE WITH YOUR RIGHTS

You have the right to:
(a) Request reasonable access to any personal data we hold about you.
(b) Prevent the processing of your data for direct marketing purposes.
(c) Ask to have inaccurate data held about you amended or deleted.

8. DATA SECURITY

8.1 We will take all reasonable measures to avoid accidental loss of your data, and that no unauthorised or unlawful processing of it takes place.

8.2 We will not transfer details to a third party, other than in the restricted ways detailed in our Data Sharing Agreement, or unless required to do so by law.

8.3 Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of personal data.

9. SUBJECT ACCESS REQUESTS

If you wish to know what personal data we hold about you, please make the request in writing. All such written requests should be sent to the Data Protection Officer, Emma Adlard, at the Foundation's registered office.

10. BREACHES OF THIS POLICY

If you consider that this policy has not been followed in respect of personal data about yourself or others please contact the Data Protection Officer, Emma Adlard, at the Foundation's registered office. The Chair of Trustees has overall responsibility for the Foundation's ongoing compliance with the UK Data Protection Act 2018 and the UK General Data Protection Regulation.

11. REVIEWS

This Policy will be reviewed annually by the Foundation's Trustees.

Last revised March 2024 (to be reviewed March 2025)