STILE ANTICO FOUNDATION

DATA PROTECTION POLICY

1. ABOUT THIS POLICY

During the course of our activities, the Stile Antico Foundation (“the Foundation”, Registered Charity no. 1156615) will process personal data (held on paper, electronically, or otherwise) about you, the Friends, donors and other supporters of Stile Antico (“the Supporters”).

We recognise the importance of treating personal data in a lawful, fair, and transparent manner, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines how we collect, use, store, and protect your personal data.

2. DATA PROTECTION PRINCIPLES

2.1 We comply with the following data protection principles. Personal data will be:

(a) Processed lawfully, fairly, and in a transparent manner.
(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 accordance with the rights of individuals.
(g) Secure.

2.2 "Personal data" means any information relating to an identified or identifiable individual. "Processing" includes collecting, storing, using, disclosing, or erasing that data.

3. HOLDING AND USING DATA

3.1 We will only process your personal data where you have given your consent and where we have a lawful basis to do so. This may include:

(a) Your consent;
(b) Performance of a contract;
(c) Compliance with a legal obligation;
(d) Our legitimate interests, provided your rights do not override those interests.

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 take reasonable steps to keep your data accurate and up to date.
Please notify us of any changes to your contact details or other personal information.

6. DATA RETENTION

We retain your data only for as long as is necessary to fulfil the purposes for which it was collected, including legal or reporting requirements. For example, if you cease to participate in the Friends scheme or make donations, we will securely delete your data after a reasonable period, unless we are required to retain it by law.

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) Request correction of inaccurate or incomplete data.
(c) Request erasure of your data ("the right to be forgotten") in certain circumstances.
(d) Prevent the processing of your data for direct marketing purposes.
(e) To withdraw your consent where processing is based on consent.

To exercise any of these rights, please contact us in writing (see section 9).

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, Nigel Doggett, at the Foundation's registered office. We will respond within one calendar month of receiving your request.

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 August 2025 (to be reviewed August 2026)