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 personal data where we have identified an appropriate lawful basis under UK GDPR. Depending on circumstances this may include:

(a) Your consent;
(b) Performance of a contract;
(c) Compliance with a legal obligation;
(d) Our legitimate interests, where those interests are not overridden by the rights and interests of the individual.

3.2 We do not generally collect special category personal data from Supporters. Where such information is collected or otherwise processed, we will ensure that an appropriate lawful basis and condition for processing under UK GDPR and the Data Protection Act 2018 applies.

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). Where the Stile Antico Group processes personal data on behalf of the Foundation, it does so under the terms of the Foundation's Data Processing Agreement. (This Data Processing Agreement is available for your information on request).

We will process personal data for the legitimate purposes of administering and delivering the Foundation's activities, including the Stile Antico Friends scheme, charitable donations, events, applications, bursaries, governance and other activities undertaken by or on behalf of the Foundation. Personal data will only be processed to the extent that it is necessary for the relevant purpose and in accordance with an appropriate lawful basis.

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

Personal data will be retained only for as long as necessary for the purpose for which it was collected and for any applicable legal, accounting or reporting requirements. Specific retention periods or criteria for determining retention periods are recorded in the Foundation's Data Register.

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) Withdraw your consent where processing is based on consent.
(f) Request restriction of processing of your personal data in certain circumstances.

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 personal data to a third party other than where such transfer is authorised under the Foundation's Data Processing Agreement, Data Register, or other applicable data sharing arrangements, or where 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 Lead, Nigel Doggett, at the Foundation's registered office. We will respond within one calendar month of receiving your request.

10. DATA PROTECTION BREACHES

If you consider that this policy has not been followed in respect of personal data about yourself or others please contact the Data Protection Lead, Nigel Doggett, 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.

Any actual or suspected personal data breach will be reported promptly to the Foundation's Data Protection Lead. The Foundation will assess the breach, take appropriate steps to contain and mitigate its effects, determine whether notification to the Information Commissioner's Office or affected individuals is required, and keep an appropriate record of the incident and actions taken.

If you are not satisfied with how we have handled your personal data or your data protection complaint, you may also complain to the Information Commissioner's Office (ICO).

11. REVIEWS

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

Last revised October 2026 (to be reviewed September 2027)