

**Necton Area Trust**  
**Website Privacy Statement**

The Purpose of this privacy statement is to explain how Necton Area Trust (NAT) processes all personal data to fulfil its data protection responsibilities. This statement will be supplemented by 'specific to stakeholder' privacy notices when needed. Brief definitions of data protection, personal data and processing can be found at the end of this statement.

The scope of this statement covers all related activities by the trustees of NAT.

The Role of NAT in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the NAT privacy manager (PM) to ensure that it is processed in accordance with the latest UK and EU data protection legislation.

The PM can be contacted by email using [nectonareatrust@gmail.com](mailto:nectonareatrust@gmail.com) or by writing to the UK office at 6 Brackenwoods, Necton, Norfolk, PE37 8EU.

The sort of personal data processed by NAT will only be basic contact information for the purposes of local volunteering, communicating news and project updates (to signed up contacts), preparing contracts (suppliers, partners) and managing donations (Gift Aid, standing order receipts). NAT's duty of confidentiality means that NAT trustees and staff will treat stakeholder and employee data with due respect and in confidence. It is only disclosed to staff that need to know it. NAT uses reasonable organisational and technical measures to ensure personal data is kept secure.

NAT also expects the same duty of confidentiality of all third parties with whom it shares personal data, including contractors. Sharing is kept to a minimum and reviewed regularly. NAT processes personal data against a lawful basis and such instances are described below:

- To respond to your general enquiries, we will use our legitimate interests;
- To comply with any legal obligation;
- When it is necessary for the performance of a contract and its prior preparation; and
- When processing a pre-defined purpose for which your consent has been sought and recorded prior to that processing commencing.

In all cases the processing of personal data by NAT shall be:

- Processed fairly, lawfully and transparently;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary (and no more);
- Accurate and, when necessary, updated;
- Kept for no longer than is necessary; and
- Processed in a manner that ensures appropriate security.

NAT will share personal data, but only when absolutely necessary, with some or all of the following third parties:

- Solicitors appointed by NAT;
- The Inland Revenue (HMRC);
- Contractors, but only on a strict need to know basis;
- Accountants appointed by NAT and only for accounting purposes; and
- Unspecified recipients but only when compelled to do so for legal reasons.

NAT will process your data in different places but mostly within the European Economic Area (EEA). Email is processed using a reputable web-based provider (Gmail and we adhere to their [policies](#)) and mobile phone contacts are stored on both office IT equipment and mobile phones. Email addresses of contacts received via our website are  
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stored on NAT's website servers (WIX.Com and their [privacy statement](#)). NAT safeguards all business and personal data in encrypted form, in so far that it is possible.

NAT follows a retention schedule to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- Routine correspondence for casual and contract related business in hard copy or in emails will be stored for 3 years or less;
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject;
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing; and
- By exception, documentation that includes personal data may be retained by NAT beyond the schedule, but only for a specific purpose and only when NAT believes there is a legitimate interest or a legal obligation to do so.

At the end of the retention schedule NAT will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that NAT allows up to 2 months after the retention schedule to complete the action.

The NAT websites only use strictly necessary cookies to enable the website to be run properly. No attempt is made to identify individuals from the cookies being used. NAT websites may link to appropriate websites for our interest. If these are used, the visitor should be aware that NAT has no responsibility for the control, content or handling of personal data by these other websites.

The General Data Protection Regulation defines the rights that you have (although these do not apply in all situations), For convenience, these rights are shown below:

- Right to be informed as to how your personal data is being processed by NAT – this is done through this statement or separate NAT privacy notices;
- Right to access your personal data held by NAT which is done by making a 'Data Subject Access Request' (DSAR) to the NAT privacy manager;
- Right to rectification of your personal data if you believe NAT has collected it incorrectly or it needs to be updated;
- Right to erasure of your personal data for which NAT no longer has a legitimate purpose to process;
- Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved;
- Right to data portability of your personal data in a machine-readable version, as you have provided but only applicable to data provided with your consent or under contract;
- Right to object to NAT processing your personal data for which it does not have a legal or contractual obligation;
- Rights related to automated decision making and profiling (however NAT does not use these techniques in its decision making);

Further details on data subjects' rights can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights or making queries about NAT' processing of personal data can be done by

- Contacting the NAT privacy manager. Please be aware that NAT will need to determine your identity before responding fully and this may involve being asked for documentation proof that, in context, will enable NAT to confirm your identity; or
- Contacting the relevant Supervisory Authority; in the UK this is the ICO.

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**What data protection, personal data and processing mean**

The term data protection, put simply, means the protection of personal data against misuse and abuse. Personal data means any information relating to an identified or identifiable natural person, also referred to as a 'data subject'. Processing has a very wide interpretation and means any operation which is performed on personal data or on sets of personal data whether or not by automated means. This includes, inter alia, collection, recording, storage, adaptation, retrieval, actual use, dissemination or otherwise making available, restricting, erasure or destruction.

**Website cookies for [www.nectonareatrust.org](http://www.nectonareatrust.org)**

All the cookies which are within our Wix website are essential cookies. This means that we (currently) do not need to ask consent from our site-visitors, or to use a cookie banner. ([Learn more about which cookies](#) are placed on our site-visitors' browsers.)

Currently, Wix.com does not offer the ability to switch off non-essential cookies.