

The Baytree Centre Privacy Statement

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1. Important things to know about how we use your personal information

The Baytree Centre ('Baytree') is a social inclusion charity for women and girls, based in Brixton, South London.

This Privacy Statement sets out how The Baytree Centre ("we", "our", "us", "Baytree") processes personal information of our service users and those associated with them, employees, workers, volunteers, trustees, donors and other third parties.

Protecting personal information and making it easy for you to find out how we use your personal information and when you can expect confidentiality is important to Baytree. This document should be read in conjunction with any contract, user agreement or other information or documentation provided to you in the context of your specific relationship with Baytree.

If you have a question, please contact us at enquiries@baytreecentre.org.uk, on 020 7733 5283 or at The Baytree Centre, 300-302 Brixton Road, London SW9 6AE.

If you would like more information on data protection and your rights, please see <https://ico.org.uk/>.

2. Whose personal data does Baytree collect and work with?

1. People accessing our services and those connected with them.
2. Employees and others seeking or undertaking paid work on our behalf.
3. Volunteers and trustees.
4. Supporters and donors.
5. People representing funders, partner organisations, suppliers and other stakeholders.
6. Those renting or otherwise using our premises.
7. People visiting our website interacting with us on social media and signing up for communications.

3. Things that apply to all our processing of personal data

Baytree collects and works with personal data. Personal data is information that can be used to identify a living individual, such as names, addresses, phone numbers, e-mail addresses, records of work we do for people, IP addresses, online identifiers, pictures or other biometric data, attendance lists, meeting minutes, mailing lists, bank account details, records of payments and financial transactions and HR records for employees and volunteers.

We need to collect and use personal data to provide our services and fulfil our charitable objectives, to fundraise and generate income for our work, to run the organisation efficiently and effectively, to meet our legal obligations and to contract with others.

We only collect the personal data that we need. Most of our data processing is done based on our legitimate interests as a charity operating to provide services but, in some situations, we will request your permission to process your data.

We will do our best to keep personal information safe and secure. We will never sell personal information to third parties. We will only give personal data to third parties in specific circumstances, including:

- Where we are working in partnership with another organisation, to enable the partnership to deliver services and report to funders.
- Where you have given us your permission to share your personal data, for example to get help or advice related to your case or enquiry from another organisation.
- To further the legitimate interests of those using Baytree's services, for example sharing personal data of employees and volunteers with third parties in the normal course of providing services.
- Where we use third party organisations to process your personal data on our behalf as set out in this Privacy Statement, for example organisations that perform business functions on our behalf (e.g. payroll and other administrative and HR functions and cloud-based ICT services including maintenance, security, data analysis, email transmission, CRM, database management services, email marketing, surveys or data hosting).
- Where we have reasonable grounds for believing that not sharing personal information will result in harm to you or a third party, in line with our legal duties, safeguarding policies and wider charitable purposes.
- Where we have legal obligations, for example, our legal obligations to prevent terrorism and money laundering, or to provide personal data to HMRC.
- In a life or death situation where we need to protect your vital interests or the vital interests of a third party, for example if you need urgent medical assistance and are unable to give your consent to us seeking such assistance on your behalf.
- Where we judge that sharing personal information is justified for the prevention of crime, in line with our safeguarding policy, confidentiality policy and wider charitable purposes.
- Where we believe that sharing information is required by law, regulation or order of a relevant body.
- Where we believe it appropriate or necessary to prevent violation of our terms of service or other agreements; take precautions against liability; protect the rights, property or safety of the Baytree Centre; maintain and protect the security and integrity of our services or infrastructure; protect ourselves and our services from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third-party claims or allegations; or assist public enforcement agencies.
- We may share aggregated information with third parties in order to further our legitimate interests as a charity including demonstrating usage of our services, identifying trends, and generating publicity.

We are committed to ensuring that suppliers who process personal data on Baytree's behalf as '[data processors](#)' treat your personal data carefully and in accordance with our written instructions and data protection legislation. They have access to personal information needed to deliver the service but may not use this personal information for other purposes.

3.1. What are my rights?

Under data protection legislation, you have the following rights:

- The right to be informed – we inform you through this Privacy Statement and through other privacy-related communications, whether you interact with us in person, by telephone, by e-mail, online or using other channels.
- The right of access – you have the right to ask us for confirmation that your data is being processed and to access this data (a 'subject access request').
- The right to rectification – you have the right to have inaccurate or incomplete personal data corrected or completed.
- The right to erasure – you have the right, in some circumstances, to ask us to erase your personal data (the 'right to be forgotten'). Sometimes, this right may not apply, for example when the personal data needs to be retained for insurance purposes or in relation to legal claims.
- The right to restrict processing – you have the right to ask us to limit how we collect and use your personal data, for example, to stop us deleting data that you might need in relation to a legal claim.
- The right to data portability – you have the right in some circumstances to be given certain of your personal data in a structured, commonly used and machine readable form.
- The right to object – you have the right, in some circumstances, to object to processing of your personal data including: processing that we justify as being based on our legitimate interests; direct marketing; and processing for research and statistical purposes.
- Rights in relation to automated decision making and profiling – Baytree has not identified any processing of personal data that currently involves solely automated decision-making or profiling.

Please get in touch (via the contact details at paragraph 1) if you wish to exercise any of your rights. We will respond within one month, though in some circumstances we may need to extend the time for a full response for a further two months. You will not usually need to pay us for making the request.

For further information and detail about your rights, see <https://ico.org.uk/for-the-public/>.

3.2. Security and measures to protect personal data, including secure disposal

We maintain appropriate levels of security in relation to the collection, storage and disclosure of your personal data and confidential information. Information is stored securely by Baytree in the cloud. We also store information in paper files and records.

We have security measures in place to protect against the loss, misuse and alteration of personal data under our control. These include: limiting access to personal information to authorised individuals; encrypting information; protecting systems, drives, folders and files by password; physical security measures; and regular backups of information.

Although we make good faith efforts to maintain the security of such personal information, no method of transmission or storage is 100% secure and we cannot guarantee that it will remain free from unauthorised access, use, disclosure, or alteration. Further, while we work hard to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent “hackers” or other unauthorised persons from illegally accessing or obtaining this information.

If we learn of a security breach involving your personal information, we may attempt to notify you electronically by posting a notice on our website or contacting you via the details you have provided to us so that you can take appropriate protective steps. By providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues.

Any sensitive or special categories of data collected and used by Baytree are only shared outside Baytree on a need-to-know basis. In the course of providing our services, we collect certain categories of sensitive data, including details of race; ethnic origin; religion; biometrics (where used for ID purposes); and health. Such processing typically relates to our legitimate interests as a charity providing grant funded services, as an employer and as an organisation engaging volunteers. In some situations, we will process such data with your consent, for example when providing it to third party organisations in connection with your service needs.

Where you use a password or unique identifier that enables you to access any of our systems or services, it is your responsibility to keep this password or unique identifier confidential – please don't share it with anyone. If you think anyone else has gained access to personal or confidential information, including any password or unique identifier, please let us know as soon as possible.

3.3. How can I complain?

We want to improve the ways in which we work. Please tell us if you feel something has gone wrong or not happened as it should. Please raise any feedback or complaint you may have in accordance with our Complaints Policy, a copy of which can be

requested from Reception (via the contact details at paragraph 1). We will try to put things right and will endeavour to learn from your comments and feedback.

You also have the right to lodge a complaint with the Information Commissioner's Office. For more information, visit <https://ico.org.uk/>.

3.4. What about personal data transferred to other countries?

Baytree makes use of various cloud-based services including:

- Client and case management services
- Email, calendar and appointment management services
- Electronic survey and online form processing services
- Event management services
- File backup and storage
- Website management and hosting
- Online platforms for processing payments and donations

Personal data uploaded to some of these services may be:

- stored in secure data centres within the UK;
- transferred from the UK to the EEA and other countries covered by a European Union 'adequacy decision' as at 31 December 2020. These arrangements are in a period of transition, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/>; or
- transferred from the UK to other countries. Such transfers are covered by standard contractual clauses, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/sccs-after-transition-period/> for further information.

4. Things that apply to specific groups

4.1. People accessing our services and those connected with them

Why do we collect and use personal data?

We do this to provide our services, to help us understand how to improve them, to report to our funders, to resource our work and to promote our legitimate interests as a charity.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include: our legitimate interests as a charity including providing education, personal development and well-being services to our beneficiaries and the legitimate interests of our beneficiaries; our service provision contracts and funding agreements; our legal obligations, including those related to safeguarding, social welfare law, terrorism and money laundering; and, in some circumstances, your consent to process personal data for particular purposes.

What kinds of personal data do we collect and use and where we do get them from?

We gather your personal information and the personal information of others involved in your case or enquiry when you visit us in person, use our websites, complete printed paper forms, speak to us by telephone or video call, complete surveys or questionnaires or communicate with us by text message, WhatsApp message, post, e-mail, online or other channels. Information is recorded in paper files, electronic files and cloud-based case management systems.

Some of the personal data we collect is sensitive, relating to health, finances, social welfare, employment, protected characteristics and other circumstances. We use some of this sensitive information to generate anonymised reports and undertake statistical analysis to identify and evidence the needs and issues faced by our beneficiaries and resource our work. This could for example include the proportions or numbers of people experiencing a particular type of problem, or with a given personal characteristic (such as ethnicity or health condition).

We may also process the personal data of other people involved in the cases or enquiries of Baytree's beneficiaries, for example, personal data relating to family members, friends, carers or support workers.

We also collect and use your personal data when you agree to receive communications from us. We also collect and use your personal data for administrative purposes, for example getting your feedback, telling you about changes to our service and responding to complaints or concerns.

Who might your personal data be shared with?

Subject to the general exceptions listed in '**Things that apply to all our processing of personal data**', we will only share the personal data of our beneficiaries with third parties when we have consent.

Personal data may be passed to Baytree by our partner organisations and other stakeholders involved in our work, for example in situations where you have given your consent for information to be shared directly with us through referral. When you provide your personal data to other organisations, you should check their privacy policies carefully.

How long do we keep personal data for?

We may keep personal data related to beneficiary cases and enquiries for at least 7 full years after case closure or last contact with Baytree. This enables us to protect both beneficiary interests and the interests of Baytree in regard to legal claims that may arise. For some personal data, we may retain information for longer periods depending on our legal obligations, beneficiary instructions and any limitation periods that may apply to the case files concerned.

If you continue using Baytree's services over a long period of time, we may not erase personal data in past case files which are over 7 years old whilst other more recent

personal data is being retained. This is to ensure continuity of service and avoid loss of potentially relevant information.

Specific provisions relating to children and young adults

If you are aged under 18, we take particular care of your personal information. Please just ask us if you have any questions.

If you are aged 16 or under and would like to use our services, please make sure that you have the permission of your parent, guardian or person with parental responsibility.

Sometimes, we use your personal information to help your parent or someone caring for you. This might be, for example, to help your family sort out problems with money, housing or work.

4.2. Employees and others seeking or undertaking paid work on our behalf

Why do we collect and use personal data?

We collect and use personal data to engage with you as an employee, worker, self-employed person, contractor or job applicant in relation to the work you undertake in these roles, including associated recruitment and selection processes. We collect and use personal data to fulfil our responsibilities as an employer, and for management and administrative purposes including HR functions, supervision and monitoring work, safeguarding, conflicts of interest, seeking your feedback, dealing with complaints, furthering the charitable aims of Baytree and the legitimate interests of those we support.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include our legitimate interests as an employer and charity and the legitimate interests of our beneficiaries. These legitimate interests include: ensuring that Baytree operates effectively and efficiently; and monitoring Baytree activities to protect the organisation against fraud, money laundering, conflicts of interest and other risks. We also process personal data on the basis of our legal obligations, for example complying with accounting and reporting requirements as an employer and a registered charity. We process some personal data on the basis of the contracts Baytree has with you that relate to your employment or work with us. We also process some personal data based on your consent.

What kinds of personal data do we collect and use and where we do get them from?

We collect and use personal data during the course of your work for Baytree, including: recruitment and selection records; use of our computer and communication systems and cloud-based services; time recording; HR records, including those related to disability, health, performance and supervision; and other personal data required in order to contract with you, including related to your right to work in the UK and financial details to enable us to make payments to you. Some of your personal data may be sourced from recruitment agencies and publicly-available sources during

recruitment and selection processes. We collect sensitive personal data, in some cases including personal data relating to criminal offences and convictions, and personal data processed in relation to the safeguarding of children and vulnerable adults. We will also process data to enable us to fulfil our duty of care to you as an employee, worker, self-employed person or contractor, for example, information about any particular health, access or communication needs.

Who might your personal data be shared with?

We may share your data with other organisations and individuals to comply with our legal obligations. We may also share your data with organisations that undertake data processing on our behalf, including HR functions such as payroll administration. In some circumstances we may need to share your personal data to further the legitimate interests of Baytree and our beneficiaries, for example in situations where we are working with third parties.

How long do we keep personal data for?

We may keep the following types of personal data for at least 7 years since the date of the last record: accident books and records; accounting records; income tax and National Insurance returns, correspondence with HMRC; maternity pay records; wage and salary records; and working time records.

Certain types of record may be kept for longer periods, including:

- records related to pension schemes and pensioners, which may be kept for at least 12 years from the date pension benefits cease;
- records related to parental leave, which may be kept for 18 years from the birth of the child;
- records involving the control of lead, asbestos, other hazardous substances or ionising radiation, special rules apply and records, which may be kept for periods in excess of 40 years, see <https://www.cipd.co.uk/knowledge/fundamentals/people/hr/keeping-records-factsheet>;
- the following records, which may be kept for more than 50 years:
 - (a) employment applications, references, identity verification records, Disclosure and Barring Service or similar statutory disclosure reference numbers and pertinent related correspondence;
 - (b) records of protection policy training delivered to personnel;
 - (c) records relating to allegations or incidents of abuse, assault or molestation.

Certain types of records will be kept permanently, including: health and safety assessments and consultations; and senior executive records.

We may keep application forms and interview notes for unsuccessful job applicants for at least 2 years. Records of successful job applicants will be transferred to their personnel file.

4.3. Volunteers and trustees

Why do we collect and use personal data?

To engage with you as a volunteer or trustee, including your recruitment, induction, training and the activities you undertake in your role. We collect and use personal data for management and administrative purposes and for internal record keeping, such as the management and facilitation of volunteer activity, safeguarding, conflicts of interest, seeking your feedback, dealing with complaints and to further the charitable aims of Baytree, including the legitimate interests of those we support.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include our legitimate interests as a charity and the legitimate interests of our beneficiaries, including: supporting you effectively in your role and fulfilling our duty of care to you; ensuring that we operate effectively and efficiently; and monitoring those who volunteer on our behalf to protect the organisation against fraud, money laundering, conflicts of interest and other risks. We also process personal data on the basis of our legal obligations, for example complying with our reporting requirements as a registered charity. We also process your personal data based on your consent.

What kinds of personal data do we collect and use and where we do get them from?

We collect and use your personal information when you express an interest in volunteering or acting as a trustee and when you undertake such roles and activities. We collect and use your personal data when you visit us in person, use Baytree's computer and communication systems and cloud-based services, websites, complete printed paper forms, speak to us on the telephone, attend events, complete surveys or questionnaires or communicate with us by post, e-mail, online or other channels. Information is recorded in paper files, electronic files and cloud-based databases. The personal data we collect will include information to assess your suitability to undertake the role in question, and may include processing of sensitive data and personal data relating to criminal offences and convictions, including data processed in relation to the safeguarding of children and vulnerable adults. We will also process data to enable us to fulfil our duty of care to you, for example, information about any particular health, access or communication needs. We may process your personal data to further the legitimate interests of our beneficiaries, for example providing your contact details to partner organisations. We may process your personal data to reimburse expenses incurred in undertaking your role for Baytree.

We may receive information about you from third parties, for example from a friend who thinks you might be interested in volunteering, or someone who provides you with a reference when you apply to volunteer with us. We may make use of personal data that is publicly available to communicate with you about voluntary opportunities at Baytree.

Who might your personal data be shared with?

We may take up references for any trustee or volunteer undertaking activities for Baytree. We may also need to share your personal data, for example as part of

safeguarding checks, to enable you to undertake particular activities for Baytree. Personal data of trustees will be shared with the Charity Commission in line with our legal obligations.

How long do we keep personal data for?

We may keep application forms and interview notes for unsuccessful volunteer and trustee applications for 2 years. Records of successful applicants will be transferred to the appropriate volunteer or trustee record.

We may keep personal data that relates to financial records, including reimbursement of expenses, for at least 7 years from the end of the last financial year they relate to for accounting purposes.

We may retain other personal data related to your activities as a trustee or volunteer for Baytree for a period of at least 7 years since the date you last undertook activity on our behalf. Some data, for example minutes of trustee meetings, or records of people volunteering for Baytree listed in our annual report will be kept permanently for historical and archiving purposes.

We will endeavour to make sure that you can simply and easily withdraw your consent to being sent information about voluntary activities and to indicate your preference for receiving communications in a particular format. If you withdraw your consent or change your preferences, we may retain a record of your withdrawal of consent or change of preferences for a reasonable period from the date you notified us: this helps us maintain accurate records and ensure that information is not sent to you in error when you have withdrawn consent.

4.4. Supporters and donors

Why do we collect and use personal data?

We do this to process donations we may receive from you, to claim Gift Aid on these donations and to update you on how your donations are being used. We collect and use your personal data when setting up direct debits or standing orders. We use your personal data to engage with you as a supporter of our work, for example to provide you with information about our activities, to tell you about how you can support our work and to record the contacts that we have with you.

We collect and use your personal data when you sign up for newsletters or other marketing communications. We may also collect and use your personal data for administrative purposes, for example responding to complaints or concerns.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include: our legitimate interests as a charity, including raising funds and monitoring who we deal with to protect Baytree against fraud, money laundering and other risks; your consent to collect and use your personal data; and our legal obligations, for example, meeting statutory requirements when processing Gift Aid payments.

What kinds of personal data do we collect and use and where we do get them from?

We collect your personal information when you visit us in person, use our websites, complete printed paper forms, speak to us on the telephone, make donations, attend events, complete surveys or questionnaires or communicate with us by post, text message, WhatsApp, e-mail or other online channel. Information is recorded in paper files, electronic files and cloud-based databases. The personal data we collect will include financial information when you make a donation, set up a direct debit or standing order, or leave us a legacy in your will.

We may receive information about you from third parties, for example from a friend who wants to send you information about our work or book an event on your behalf.

Who might your personal data be shared with?

We will only share your personal data with third parties with your consent, subject to the general exceptions listed in '**Things that apply to all our processing of personal data**'.

How long do we keep personal data for?

We may keep personal data that relates to financial records for at least 7 years from the end of the last financial year they relate to for accounting purposes. Some financial information may be kept for longer, for example information related to legacy gifts. We may retain other personal data related to your support for and engagement with Baytree for a period of at least 7 years since the date of your last engagement with Baytree.

We will endeavour to make sure that you can simply and easily withdraw your consent to be sent information about our work and to indicate your preference for receiving communications in a particular format. If you withdraw your consent or change your preferences, we may retain a record of your withdrawal of consent or change of preferences for a reasonable period from the date you notified us: this helps us maintain accurate records and ensure that information is not sent to you in error when you have withdrawn consent.

4.5. People representing funders, partner organisations, suppliers and other stakeholders relevant to our work

Why do we collect and use personal data?

We collect and use your personal data to engage with you as a Baytree partner, funder, supplier or other stakeholder. We collect and use personal data to network and undertake joint activities where we have common interests, to manage our existing income effectively and generate new income for our work, to purchase and use services and products for Baytree purposes, and to publicise and promote our work. This includes telling you about changes to our activities and services and work to analyse and improve the services we offer. We may also collect and use personal data when undertaking work on behalf of individual beneficiaries of Baytree.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include our legitimate interests as a charity and the legitimate interests of our beneficiaries, including: working with other organisations and individuals in line with our charitable objectives; ensuring that Baytree operates effectively and efficiently; and monitoring Baytree activities to protect the organisation against fraud, money laundering, conflicts of interest and other risks. We process personal data on the basis of our legal obligations, for example complying with accounting requirements and reporting requirements as a registered charity. We process personal data on the basis of the contracts that we may have with you that relate to provision of services or products. We also process your personal data based on your consent.

What kinds of personal data do we collect and use and where we do get them from?

Your information may be shared with us by other organisations, individuals, Baytree's beneficiaries, employees and volunteers, for example when developing joint projects or undertaking networking activities, or when you have been involved in a beneficiary's case. We may receive updated contact information from third parties so that we can correct our records and engage with you more easily.

We may combine information you provide to us with information available from public sources or records in order to gain a better understanding of organisations and individuals who may be interested in engaging with us. This helps us to generate new income to support our work and deliver our services more effectively.

Who might your personal data be shared with?

We may share personal data with third parties to further our legitimate interests as a charity and the legitimate interests of our beneficiaries. This might include details of your work in relation to Baytree's beneficiaries, or other personal data as set out in our contractual terms and conditions. We may also share your personal data with third parties with your explicit consent, subject to the general exceptions listed in '**Things that apply to all our processing of personal data**'.

How long do we keep personal data for?

We may keep personal data that relates to financial records, including provision of services or products, for at least 7 years from the end of the last financial year they relate to for accounting purposes. We may retain other personal data related to your engagement with Baytree for a period of at least 7 years since the date of your last engagement with us.

We will endeavour to make sure that you can simply and easily withdraw your consent to be sent information about our products and services and to indicate your preference for receiving communications in a particular format. If you withdraw your consent or change your preferences, we may retain a record of your withdrawal of consent or change of preferences for a reasonable period from the date you notified us: this helps us maintain accurate records and ensure that information is not sent to you in error when you have withdrawn consent.

4.6. Those renting or otherwise using our premises

Why do we collect and use personal data?

We do this to enable you to use our premises, including managing health, safety and security and receiving rent.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include: the contracts that we may have with you that relate to use of our premises; our legal obligations, for example, complying with our duties as a landlord and accountancy requirements; your consent to collect and use your personal data; and our legitimate interests as a charity, including monitoring who we deal with to protect Baytree against fraud, money laundering and other risks.

What kinds of personal data do we collect and use and where we do get them from?

We collect your personal information when you contract with us or express an interest in our products and services. We collect your personal information when you visit us in person, use our websites, complete printed paper forms, speak to us on the telephone, attend events, complete surveys or questionnaires or communicate with us by text message, WhatsApp, post, e-mail or other online channel. Information is recorded in paper files, electronic files and cloud-based databases.

Who might your personal data be shared with?

We may share your personal data with third parties as set out in contractual terms and conditions. We may also share your personal data with third parties with your explicit consent, subject to the general exceptions listed in '**Things that apply to all our processing of personal data**'.

How long do we keep personal data for?

We may keep personal data that relates to financial records, including provision of services or products, for at least 7 years from the end of the last financial year they relate to for accounting purposes. We may retain other personal data related to your

use of Baytree premises for a period of at least 7 years since the date you last used them.

We will endeavour to ensure that you can simply and easily withdraw your consent to be sent information about our products and services and to indicate your preference for receiving communications in a particular format. If you withdraw your consent or change your preferences, we may retain a record of your withdrawal of consent or change of preferences for a reasonable period from the date you notified us: this helps us maintain accurate records and ensure that information is not sent to you in error when you have withdrawn consent.

4.7. People visiting our website, interacting with us on social media and signing up for communications

Why do we collect and use personal data?

We use personal information to establish and enhance our relationship with you. We may use personal information to operate, provide, improve, and maintain The Baytree Centre website; to prevent abusive and fraudulent use of The Baytree Centre website; to personalise and display content on The Baytree Centre website; where permitted by applicable law, to send you information, including via email, about our products and services in which we believe you may be interested; to respond to your enquiries and for other customer service purposes; and for other administrative and internal business purposes.

We may also use personal data to: (a) remember your information so that you will not have to re-enter it during your visit or the next time you visit The Baytree Centre website; and (b) monitor aggregate website usage metrics such as total number of visitors and pages viewed.

How do we justify this according to data protection legislation?

Our lawful bases for processing this data include our legitimate interests as a charity and the legitimate interests of our beneficiaries; ensuring that Baytree operates effectively and efficiently; and monitoring Baytree activities to protect the organisation against fraud, money laundering, conflicts of interest and other risks. We process personal data on the basis of our legal obligations, for example complying with accounting requirements and reporting requirements as a registered charity. We also process your personal data based on your consent.

What kinds of personal data do we collect and use and where we do get them from?

We collect the following data about people visiting our website and interacting with us on social media:

- (1) User-Supplied Information - information that you voluntarily submit to us. We may collect this when you choose to provide us with your personal information via The Baytree Centre website, including when you send us an email asking a question, register to attend an event, submit a form to receive marketing materials or email newsletters, or request any research or whitepapers; and

(2) Passive Data – this is technical data automatically collected from all visitors to The Baytree Centre website and our social media. Like most websites, we automatically receive and record information on our server logs from your browser when you use The Baytree Centre website. We may use a variety of methods, including clear GIFs or Pixels (also known as “web beacons”) and “cookies”, to collect this information. We use both session and persistent cookies. The information that we may collect with these automated methods may include, for example, your IP address, cookie information, a unique device or user ID, browser type, system type, the content and pages that you access on The Baytree Centre website, the frequency and duration of your visits to The Baytree Centre website, and the “referring URL” (i.e., the page from which you navigated to The Baytree Centre website). We may also use cookies on The Baytree Centre website to store session validators on your hard drive. If we directly combine any information gathered through passive means with personal information, we treat the combined information as personal information under this Privacy Statement. Otherwise, we use information collected by passive means in aggregated forms.

For additional information about the technologies that we use and how they operate, please see our Cookie Policy (<https://www.baytreecentre.org/cookie-policy/>).

You may, as a visitor to our website, choose not to provide us with personal information. You may also, at any time, access your personal information to update, correct, or delete certain personal information about you by contacting Reception (via the contact details at paragraph 1). You also have the right to obtain from The Baytree Centre the erasure of personal data about you in accordance with applicable data privacy laws as set out at paragraph 3.1 above.

Who might your personal data be shared with?

We do not sell or rent email addresses and other personal information that we collect directly through The Baytree Centre website. Please be aware, however, that any information that you voluntarily choose to display on any publicly available portion of website, or on any service, becomes publicly available and may be collected and used by us or others without restriction.

We may share personal data with third parties to further our legitimate interests as a charity and the legitimate interests of our beneficiaries. We may also share your personal data with third parties with your explicit consent, subject to the general exceptions listed in '**Things that apply to all our processing of personal data**'. If you use the Baytree Centre website or social media outside the United Kingdom, you consent for your personal data to be transferred from your home jurisdiction to the United Kingdom and to other jurisdictions in accordance with paragraph 3.4 above.

We use Google Analytics to analyse use of The Baytree Centre website. Google Analytics provides us with aggregated data in order to help us make informed business decisions. Google is a third party and controls information collected through



Google Analytics and you should check and be comfortable with its privacy practices prior to using The Baytree Centre website. You may review information about Google's privacy practices with respect to Google Analytics at <http://www.google.com/analytics/learn/privacy.html>.

How long do we keep personal data for?

We may retain personal data gathered via our website or social media sites for a period of at least 7 years. We will endeavour to make sure that you can simply and easily withdraw your consent to be sent information about our products and services and to indicate your preference for receiving communications in a particular format. Please be aware that even if you update or remove personal information that you have provided to us, your personal information may be retained in our backup files and archives for a reasonable period of time for legal purposes. Further, we may retain a record of your withdrawal of consent or change of preferences for a reasonable period from the date you notified us: this helps us maintain accurate records and ensure that information is not sent to you in error when you have withdrawn consent.

Communications and Marketing

If you opt in to receive communications from us, we may send you administrative messages and updates regarding your account, updates regarding The Baytree Centre website, and, where permitted by applicable law, information regarding our offer, products and services, including, without, limitation, through social media updates, by email and postal mail. If you no longer want to receive commercial email messages, you may indicate your preferences by taking the steps described in such messages. Also, you may indicate your preferences regarding commercial email messages and postal mail messages by contacting us at Reception (via the contact details at paragraph 1) or via the website.

5. Changes to this Privacy Statement

We keep our policies under regular review. Any significant changes will be reflected in this Privacy Statement, which will be available via our website or on request from Reception (via the contact details at paragraph 1). We encourage you to periodically review this Privacy Statement to stay informed about our collection, use and disclosure of personal information. Your continued use of our services constitutes your agreement to our then current Privacy Statement.

If you have any questions about this Privacy Statement, you may contact us via the contact details at paragraph 1.

Last reviewed	Reviewed by	Next Review
March 2022	Board of Trustees	September 2022