

MILL GROVE – DATA PRIVACY NOTICE

1 Personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2 Who are we?

For the purposes of this notice, 'we' are Mill Grove. This includes (i) 'the Family', that comprises the worldwide community of individuals who have lived or lodged at Mill Grove, or who see it as their home, together with their wider families, normally immediate relatives and descendants; (ii) those involved in the Pre-School, Rose Walton Centre and associated activities on the premises. The director of Mill Grove is the 'data controller'. This means that the trustees have delegated to the director responsibility for deciding how personal data held by Mill Grove is processed and for what purposes.

3 How do we process your personal data?

Mill Grove complies with its obligations under the GDPR by

- keeping personal data up to date
- storing and destroying it securely
- not collecting or retaining excessive amounts of personal data
- protecting personal data from loss, misuse, unauthorised access and disclosure
- not providing personal data to third parties, except where there is specific authorisation to do so
- ensuring that appropriate practical and technical measures are in place to protect personal data.

We use personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in South Woodford and further afield
- To fulfil our legal responsibilities to maintain records and registers as an employer and as a registered charity whose primary concern is the care and protection of vulnerable children and their families
- To manage relationships with contractors, hirers and suppliers
- To maintain our accounts and records including the processing of gift aid applications
- To administer and keep up to date records of the Mill Grove Family, as shared with us by those individuals and families worldwide
- To facilitate contact between worldwide members of the Mill Grove Family
- To share Family details and news appropriately with other Mill Grove Family members consistent with our time-honoured traditions over many years, including production of our annual 'Links' magazine;
- To inform other friends of news and events at Mill Grove.

4 What is the legal basis for processing your personal data?

- The explicit consent of the data subject (*Article 6[a]*)
- To ensure that we can effectively fulfil our legitimate and charitable objectives to Family and community (*Article 9 [d]*)
- To ensure that we can keep interested parties informed about news, events, activities and services
- To ensure that we can process gift aid donations
- To ensure that we can fulfil our legal obligations under employment, social security and social protection law, or collective agreement (*Article 6 [c]*)
- To protect the vital interests of children and their families (*Article 6 [d]; 9[c]*)
- Processing (*Article 9[2]*) by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

5 Sharing personal data

Personal data will continue to be treated as strictly confidential and will only be shared with other members of the Family in furtherance of our objectives as a Charity for purposes which serve the Family, or for legal reasons. We will only share an individual's personal data with third parties with the consent of that individual.

6 How long do we keep personal data?

Mill Grove is a family, and Family is at the very core of its existence. Members are not club members, but part of a Family, and their history does not cease to be relevant after a fixed period of years. Consistent with our charitable and Family values of unconditional love and commitment we have no policy of deleting data after a set period of time.

Other personal data is kept only so long as it is relevant, up to date, and we have the consent of the individual concerned.

7 Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary or appropriate for us to retain such data;
- The right to withdraw your consent to processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- Where legally applicable, the right to object to the processing of personal data
- The right to lodge a complaint with the Information Commissioners Office.

8 Further processing

Should we need or wish to use personal data for a new purpose, not covered by this Data Protection Notice, then we will issue a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek consent prior to the new processing.

9 Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact Keith White, Mill Grove, 10 Crescent Road, London E18 1JB

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.