**Privacy Notice: Trustees**

This statement explains how Nelson’s Journey will collect and use personal information of its Trustees. This statement (together with any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Nelson’s Journey is a charity registered in England and Wales (a Charitable Incorporated Organisation; Registered Charity 1170605), based at: Nelson’s Journey, Bradbury Building – Smiles House, Octagon Business Park, Hospital Lane, Little Plumstead, Norfolk NR13 5FH.

This statement may be changed from time to time, and it was last updated on 28 February 2019. Updates will be circulated by email and made available to Trustees at Board meetings.

**How your information will be used**

Nelson’s Journey keeps and processes information about you in relation to your Trustee role. This includes personal information such as your: name, address, date of birth, contact details, emergency contact details, details of medical conditions and medications, photographs and videos, bank account numbers, volunteering records and other information as below. Information will also be held relating to Trustees’ financial interests and conflicts of interests, and attendances and contributions made at meetings.

Your information will be stored and processed securely, and may be kept on paper and in electronic documents.

The information we hold and process will be used for our management and administrative use. We will keep and use it to help us meet the governance responsibilities of the charity, and to manage our dealings with you effectively, lawfully and appropriately. We will process your information during the Trustee recruitment process, whilst you are a Trustee, at the time when your Trustee role ends and after you have left. This includes using information to enable us to manage Trustee activities, to comply with any legal requirements, to pursue the legitimate interests of the organisation and to protect our legal position in the event of legal proceedings. If we don’t have your personal information, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications.

We may need to process your data for our legitimate interests, for example to prevent fraud, administrative purposes or reporting potential crimes. We will never process your data where these interests are overridden by your own interests.

Much of the information we hold will have been provided by you, but some may come from other sources at Nelson’s Journey, such as staff and volunteers, or in some cases, external sources, such as referees.

Nelson’s Journey holds Trustees’ information required for various processes, including expenses purposes, outcomes of DBS disclosure checks (if required), health and safety reports, contact and emergency contact details (including medical conditions), complying with guidance from the Charity Commission, and information required for insurance purposes. We record CCTV images and keep records from door access systems for security purposes at Smiles House.

We will process your bank details where you have provided them for the purpose of responding to mileage and expense claims. This information is stored securely electronically and paper records are kept in a locked filing cabinet.

You will be referred to in many internal Nelson’s Journey documents, minutes of meetings, photos and other media, and records that relate to your Trustee role.

You will be listed in the charity’s Annual Accounts and included in reports as required by the Charity Commission.

Where necessary, we may keep sensitive personal information relating to your health, which could include notes of medical conditions that might present a threat to your health and wellbeing. This information will be used in order to comply with our health and safety obligations, and to consider how your health affects your ability to take part in any activities and whether any adjustments might be appropriate.

If we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

We will disclose information about you to ‘third parties’ (organisations and people outside of Nelson’s Journey) if we are legally obliged to do so, or where we need to comply with our contractual duties; and where there is a need to protect the interests of Nelson’s Journey or others (e.g. safeguarding reports). We may pass on your details to an organisation that we trust if needed to deliver a service (such as for training, for insurance, to organise activities provided by other organisations, and for transport provision) or for the terms of a contract (such as for banking and financial services). We will share your information with the Charity Commission in accordance with their guidance and requirements.

If your activity requires you to have a DBS check, then your personal data will be transferred to the Disclosure Barring Service either through an Umbrella body or through the online DBS update service. If you have given consent, we may provide information about you and your volunteering to third parties who may wish to recognise your volunteering achievements. We may also provide information about your volunteering to prospective employers and work experience providers if you have given consent.

In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements.

We have in place safeguards including the use of locked filing cabinets at Smiles House and password protected PCs to ensure the security of your data. Where your data has to be taken outside of Smiles House (such as emergency contact forms or photos of you taken during an event outside Smiles House), its safekeeping will be managed by an appropriate person at Nelson’s Journey.

Your personal data will be stored throughout your time with Nelson’s Journey, and kept for a limited time beyond that period where a need has been established.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

**Legal basis for processing personal data**

We will process your personal information through our 'legitimate interests', where we have identified that we need to process your information to achieve an identified interest, and by taking into account your rights and interests. We will not process your personal information if we feel that there is an imbalance. Some examples of where we have a legitimate interest to process your personal information are for administrative purposes, for improving our services, for our legal purposes, for dealing with complaints, or for complying with guidance from the Charity Commission and other relevant bodies.

In some cases, we may use your personal information on the basis of your consent.

**Your rights**

You have a number of rights with regard to your personal data. You have the right to

request from us access to and correction or deletion of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability (which means providing you with your data in a format that you can use for other purposes).

If you have provided consent for the processing of your data (for example, you have told us that we can use photos of you of your volunteering activities) you have the right (in certain circumstances) to withdraw that consent at any time.

If you have any concerns as to how your data is processed, please contact the Chief Executive Officer Simon Wright at simon@nelsonsjourney.org.uk

You have the right to lodge a complaint to the Information Commissioners’ Office if you believe that we have not complied with the requirements of data protection legislation. You can do so by calling the ICO helpline on 0303 123 1113 or via their website at ico.org.uk