

GDPR & DATA PROTECTION

A change in government legislation regarding data protection called The General Data Protection Regulation (GDPR) has been in place from 25th May 2018.

The Sabre Trust (TST) has updated its Privacy Statement and its Privacy Policy. From time to time these documents will be further updated to ensure that TST is fully compliant with GDPR requirements and the way that TST store and process personal data and your rights around that are clearly communicated.

If you have any comments on either documents please send your comments and questions to infothesabretrust@gmail.com. We may not be able to respond directly to all comments and queries however we will take them into account as we work continue to work through the impact of this legislation on the work we do for our clients.

PRIVACY STATEMENT

Last Updated: 24/03/20

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Privacy Statement

1. PURPOSE OF DOCUMENT

This Privacy Statement describes how personal data we collect from users of our website at www.thesabretrust.co.uk will be collected, stored and processed.

This statement and any privacy statement or policy of partners that operate websites on our behalf, is to be read in conjunction with the TST Privacy Policy which is published on www.thesabretrust.co.uk and describes how all the personal data TST collect will be collected, stored and processed.

2. INTRODUCTION

The Sabre Trust is a Charitable Incorporated Organisation and registered in England and Wales with the Charity Commission registered number 1161190. The Sabre Trust is the data controller under data protection legislation.

TST is the owner of www.thesabretrust.co.uk and the website is managed by Squarespace.com. For the purposes of data protection legislation, TST is the data controller.

TST is committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act (DPA) 1998 up to 24 May 2018 and the General Data Protection Regulation (GDPR) on and from 25 May 2018 (Data Protection Legislation).

This statement explains how the information we collect about you whilst you use our website is used and kept securely. It also explains your privacy choices when using our website as well as your right to access your information under Data Protection Legislation.

3. THE INFORMATION WE COLLECT ABOUT YOU

We may collect the following information about you through our website:

- Your name, email address, postal address, phone number, bank details and any other information you voluntarily provide to us via our website and online forms.
- Your IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) which is automatically recognised by the web server.

4. HOW WE USE YOUR INFORMATION

We may use your personal information that you provide to us on our website for a number of purposes, including:

- To deal with your requests and enquiries.
- To contact you for reasons related to your enquiry.
- To notify you about other sources of income relative to your requests.
- To publish details of success in our newsletters.
- To use your IP address to monitor traffic and gather browsing behaviours of visitors to our website. We will not use your IP address to identify you in any way.

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5. PROTECTING YOUR INFORMATION

The data that we collect from you may be transferred to a destination external to TST's own secure network, for example, the accountants and auditors.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet. We use up-to-date industry procedures to protect your personal information. Where appropriate we will also protect the security of your data using Secure Sockets Layer (SSL) encryption technology.

6. E-NEWSLETTERS

Our website may provide a facility for users to sign-up to our e-newsletters (eg Cut and Thrust). We may use a third party provider/software to deliver our e-newsletters and manage the opt-in/out and unsubscribe facilities.

If you (through the sign-up process) consent to us sending you these types of communications, we will let you know who the third party provider is at that time.

All newsletters will contain instructions about how to opt-out of that newsletter and also unsubscribe to all similar e-newsletters.

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletters.

7. SURVEYS

We may carry out surveys using a third party provider, Survey Monkey (www.surveymonkey.com). These surveys may be accessible through our website.

When we collect your personal data through our website (eg through newsletter sign-ups) we may ask you for your consent to participate in our surveys. If you have provided consent to participate, we will transfer your data to Survey Monkey for these purposes only.

In each survey, we will clearly tell you what personal data we are collecting, why we are collecting it and what it will be used for. We will provide a link to terms and conditions for any incentives offered to take part in that survey. We do not link any other information about your browsing activity with the survey data, which is stored separately.

8. SERVICE AND MARKETING MESSAGES

If you are currently receiving service messages or marketing communications from TST and no longer wish to do so, please let us know by contacting us at infothesabretrust@gmail.com

9. YOUR RIGHTS AND FINDING OUT WHAT INFORMATION TST HOLDS ABOUT YOU

All individuals who are the subject of personal data held by us are entitled to:

If you are currently receiving service messages or marketing communications from TST and no longer wish to do so, please let us know by contacting us at infothesabretrust.co.uk

- ask what information we hold about you and why
- ask how to gain access to it
- be informed of how to keep it up to date
- have inaccurate personal data corrected or removed
- prevent us from processing information or request that it is stopped if the processing of such data is likely to cause substantial, unwarranted damage or distress to the individual or anyone else

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- require us to ensure that no decision which significantly affects an individual is solely based on an automated process for the purposes of evaluating matters relating to him/her, such as conduct or performance
- be informed what we are doing to comply with our obligations under the Data Protection Act.
- This right is subject to certain exemptions which are set out in the Act.

Under the Data Protection Legislation, you can ask to see any personal information that we hold about you. Such requests are called Subject Access Requests.

Subject Access Requests should be made in writing to the address given below.

Fees

We will not charge a fee for this. However, we will charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We will also charge a reasonable fee to comply with requests for further copies of the same information.

The fee will be based on the administrative cost of providing the information.

Timescales

We aim to comply with requests for access to personal information as quickly as possible. In most cases we will be able to provide a copy of the information within one month of receipt of your written request. In order to do this we may ask you to provide additional details about the source, location and timeframe of the information you are requesting.

We may on occasions extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Manifestly unfounded or excessive requests

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- charge a reasonable fee taking into account the administrative costs of providing the information; or
- refuse to respond.

If we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

How will the information be provided?

We will verify the identity of the person making the request, using reasonable means.

Where the data is stored on the membership system you will be provided with direct access to your data via that system

Where the data is published on the TST website, you will be provided with the links to the website.

Requests for large amounts of personal data

If your request requires us to process a large quantity of information, we will ask you to specify the information the request relates to.

Rights and freedoms of others

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The right to obtain a copy of information or to access personal data should not adversely affect the rights and freedoms of others. If by providing the information requested we would have to disclose information relating to or identifying a third party, we will only do so provided the third party gives consent, otherwise we may edit the data to remove the identity of the third party. Unless we are under a legal obligation to release data, or the individual has given us permission, personal information will only be released to the individual to whom it relates. The disclosure of such information to anyone else without their consent may be a criminal offence.

Making a Subject Access Request

If you would like to make a Subject Access Request, please contact TST's Data Protection Officer:
Data Protection Officer
24, Priors Acre, Boxgrove, Chichester, PO18 0ER.

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source, location and timeframe of the information you are requesting.

10. APPENDIX A - COOKIES, THE TYPES WE USE AND HOW YOU CAN DISABLE THEM.

In this section you will find information on what cookies may be set when you visit the TST website and how to manage and disable them. TST does not use cookies, but [squarespace.com](https://www.squarespace.com) does use cookies, so by default the same cookies will operate on the TST website.

10.1 WHAT ARE COOKIES?

A cookie is a piece of text that a website transfers to your computer's hard disk in order to remember who you are. Cookies interact with your computer and our website faster and easier by remembering the registration details and preferences from previous visits. Typically, a cookie will contain the name of the website from which the cookie has come, the lifetime of the cookie and a value. The use of cookies does not give us access to the rest of your computer and only the site that created the cookie can read it.

10.2 WHAT TYPES OF COOKIES ARE USED?

Squarespace uses

1. Session cookies - these are temporary cookies that remain in the internet browser's folder of your computer until you close the browser.
2. Persistent/Permanent cookies - these remain in the internet browser's folder of your computer for longer than the time you are visiting this website. Squarespace needs to use a cookie to remember your refusal of your use of cookies. This cookie does not store any other information and is not used for any other purposes. If you delete your browsing history including cookies you will delete this cookie and will therefore need to readjust your browser setting again.
3. Analytical cookies - Squarespace uses Google Analytics cookies (third party cookie) for the following purposes:
 - a cookie to record the time of your first visit to website, the time of your most recent visit to the website and the time of your current visit;
 - a cookie to record how long you stayed on the website;
 - a cookie to record how you located our website (i.e. Google search, keyword, link from other page etc).

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4. Third party cookies - Squarespace allows partners or service providers to use cookies on its websites. These cookies are used to help them understand how a specific promotion or campaign is performing. The information obtained from these cookies is not used by TST. For more information on Squarespace's use of your information, please visit the Squarespace Privacy and Data Sharing pages.

<https://www.squarespace.com/cookie-policy>

and their support pages at

<https://support.squarespace.com/hc/en-us/articles/360000851908-GDPR-and-Squarespace>

TST does not use the Squarespace cookies for the purposes of tracking your Internet usage after leaving our website and we do not store your personal information. They will also not be used in connection with any other information to identify you in any way.

To prevent Google Analytics cookies being set, you may wish to install the Google Analytics Opt-Out Browser Add-On (<http://tools.google.com/dlpage/gaoptout>).

10.3 CAN I OPT OUT OF COOKIES?

TST will not use cookies to collect personally identifiable information about you. You can restrict or block the cookies which are set by Squarespace, and you can do so by accessing your Internet browser settings. The 'Help' function within your browser should tell you how.

For general information about cookies and how to disable them, please visit: <http://www.aboutcookies.org>

or <http://www.allaboutcookies.org>

Please be aware that restricting cookies may impact on the functionality of our website. For information on how to manage cookies on a mobile phone, games console or internet-enabled television, you should refer to the operations manual specific to each device. To opt out of any third- parties using cookies where data about your interaction with our website is collected, please refer to their website for this information.

Version History (can be placed at end)

Privacy Statement

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24/03/20

Updated by

VMM

Comments

First draft

Final version for publication Minor additions