



Privacy Policy

Ufton Court Educational Trust and Ufton Court Limited

We want every child to have the freedom to flourish outside the classroom today so they can create a better world tomorrow. In our safe space, children learn about themselves and the world around them, helping them grow up more confident, curious and capable. Our comprehensive, trauma informed therapeutic model equips children to explore their inner selves to help them switch lanes and thrive and embrace life's potential. Our immersive programmes harness the power of the outdoors through experiential learning with proven results. Our approach is designed in collaboration with academic experts, grounded in research and carefully chosen for their proven effectiveness in aiding children with trauma. We offer four evidence-led programmes designed to deliver the outcomes that children need and deserve: Ufton Adventure, Ufton History and Ufton Outdoors. Ufton supports over 20,000 children every year.

Ufton Court Limited harnesses the beauty of our heritage location to host weddings. Ufton Court Limited donates 100% of its profits to Ufton Court Educational Trust.

For the purposes of UK Data Protection Law we are registered as a Data Controller under registration number 00015250767.

In this Notice, 'Ufton', 'we', 'us', 'our' means:

- Ufton Court Educational Trust (charity registration number 1116659) with a registered address at Ufton Court, Green Lane, Ufton Nerve, Reading, RG7 4HD
- Ufton Court Limited (Company number 05815533) with a registered address at Ufton Court, Green Lane, Ufton Nerve, Reading, RG7 4HD

In this Notice, 'Supporters', 'you', 'your' means:

- Donors and fundraisers who give to Ufton, either financially or their time
- Schools who participate in any of our programmes
- Couples marrying through Ufton Weddings
- Community Organisations
- Any visitor to our website or site in Ufton Nerve
- Anyone who is interested in our work

If you have any questions or if you don't want us to process your information in the ways described, you can get in touch with us in the following ways:

1. Email us: enquiries@ufton.org.uk
2. Telephone us: 0118 983 2099
3. Write to us: Ufton Court, Green Lane, Ufton Nerve, RG7 4HD

Raising concerns with us

If you are unhappy with the way we process your data, please contact us so we can understand what went wrong and how we can remedy our mistake. However, you can also make a complaint to the Information Commissioner's Office (ICO) which regulates the use of information in the UK. They can be contacted by:

- Telephone 0303 123 1113
- Write to the ICO: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Or by going online to www.ico.org.uk/concerns



If you are based outside of the UK, the complaint should be directed to the relevant Data Protection Supervisory Authority in that Country.

Right to be Informed

You have the right to be informed as to how we use your data and under what lawful basis we carry out any processing. This Privacy Notice sets this information out however if you would like further information or feel that your rights are not being respected, please get in contact with any of the details listed above.

Right of Erasure – also known as the right to be forgotten

You may ask us to delete some or all your information we hold about you. Sometimes where we have a legal obligation we cannot erase your personal data.

Right to Object

You have the right to object to processing where we are using your personal information such as where it is based on legitimate interests or for direct marketing.

Inaccurate personal information corrected

Inaccurate or incomplete information we hold about you can be corrected. The accuracy of your information is important to us and we are working on ways to make this easier for you to review and correct the information that we hold about you. We will also carry out an annual accuracy check. If any of your information is out of date or if you are unsure of this, please get in touch through any of the contact details listed in this notice.

Right of restriction

You have a right to restrict the processing of some or all your personal information if there is a disagreement about its accuracy, or we are not lawfully allowed to use it.

Right to Access your information

You have a right to request access to a copy of your personal information that we hold about you, along with the information on what personal information we use, why we use it, who we share it with, how long we keep it for and whenever it has been used for automated decision making. You can make a request for access free of charge and proof of identity is required.

Automated decision making and profiling

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We currently do not undertake automated decision making in our HR department. We may profile information about our potential donors. You have the right to question the outcome of automated decisions and our profiling activities that may create legal effects or create a similar significant impact on you.

Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form so it can be easily transferred.

Right to withdraw consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data

Keeping your information safe

We take looking after your information very seriously. We have implemented appropriate physical, technical and organisational measures to ensure that your personal information is secure when under our control, both on and offline, from improper access, use, alteration, destruction and loss.



Why we collect your personal data and our promise to you

Ufton believes it's important to be up front about what we do with your data – we're committed to keeping it safe and treating it with respect. This policy outlines everything you need to understand how we collect and use the information that you either provide to us or which is provided to us about you by third parties or via publicly available sources.

For the purposes of the information we collect directly from you, we are the sole 'Data Controller' of your information. This means that only we determine the purpose for and the way your information is used. We'll never sell your personal information or share it with another organisation for their own marketing purposes.

Your personal data helps us to raise money in a more efficient and cost-effective way, helping us to better target our donation requests and create more meaningful direct marketing campaigns. It also helps us to improve the education we provide to children. Childhood is short and children deserve more. Ufton provides three educational streams that enables children to thrive. We wouldn't be able to do this without your involvement and support.

How we directly receive information

We receive information directly from you when you:

- Sign-up for, or attend, an event
- Request an information pack
- Sign up to fundraise for Ufton or order fundraising materials from us
- Donate
- Let us know that you are holding a fundraising event or promotional activity
- Let us know that you want to support our work in a more practical way (e.g. raising awareness of Ufton or volunteering for us)
- Call or email us to find out more about what we do
- Submit a request for a bursary or grant
- Book a day or residential visit with us
- Information Exchange forms which capture important information about a child's dietary requirements or medical information relevant to their visit with us
- Book a workshop in your school with us
- Sign up for, or attend a wedding fayre
- Book a wedding with us
- Provide us for information to support a child's stay with us e.g. dietary requirements
- Complete a survey
- Create an account on our website or booking system
- Subscribe for a membership
- Enter a competition
- Sign a petition
- Apply for a job or voluntary role
- Any other information provided by yourself at the request of Ufton
- Buy something from us

We will also collect your information if you email, phone or write to us. Some phone calls made may be recorded for training, monitoring and reference purposes.



How we indirectly receive information from you

We indirectly receive information from you when:

- You sign up to participate in a fundraising event for us through an independent third-party website or you make a donation through a third-party, e.g. CAF, The Big Give, Meta or JustGiving
- You enquire about weddings through an independent third-party website e.g. Hitched or Bridebook
- You enquire about a day or residential visit through an independent third-party platform e.g. Plan My School Trip or UK School Trips
- When people start a fundraising activity for Ufton on a social media platform e.g. Meta or TikTok
- A friend or colleague shares your details with us or makes an introduction to us with the view of you supporting our work or becoming involved in our programmes

We sometimes carry out research and analysis using publicly available sources to understand our supporters. We believe it's crucial that we raise money in the most cost-effective ways possible. That's why we take a closer look at the personal information of our supporters to understand how they might be able to help in the future. This means we can better target our donation requests and deliver more cost-effective fundraising. See the "Profiling" section in this notice for more information.

Financial transactions relating to our website and services are handled by our payment/donation services providers, CAF, GWD, Stripe and SumUp. You can find information about the payment services providers' privacy policies and practices at:

- [CAF](#)
- [GWD](#)
- [Stripe](#)
- [SumUp](#)

All debit and credit card details are processed securely by our payment processing partner, according to the Payment Card Industry Security Standards.

Finally, like many other websites, we use Cookies – a cookie is a small text file that we transfer to your computer that helps our website to remember you. Cookies help to improve your experience of using our website by making the interaction faster and easier e.g. by automatically filling in your contact details in text fields.

Cookies also capture your IP Address* and information about the device or operating system you're using. Cookies help us to improve how our website operates which, in turn, means that we can deliver a better online experience to our supporters.

We use Cookies to distinguish you from other users of our website. This helps us to provide you with a positive experience when you come to our website.



We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide. We use the following types of Cookies:

- Authentication - We use cookies to identify you when you visit our website and as you navigate our website
- Status - We use cookies to help us to determine if you are logged into our website
- Personalisation - We use cookies to store information about your preferences and to personalise the website for you
- Security - We use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
- Advertising - We use cookies to help us to display advertisements that will be relevant to you
- Analysis - We use cookies to help us to analyse the use and performance of our website and services

You can opt-out of all our cookies (except the essential cookies). If you have any questions about how we use Cookies, please contact us.

* An IP address is a unique string of numbers separated by full stops. They are unique to each computer and identifies each device using the internet.

The data we collect and what we do with it

If you choose to support us either by volunteering, fundraising on our behalf, signing up for an event, booking a wedding, sharing your experiences of Ufton or you book a visit with us we collect:

- Identity data which includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. This also includes your contact details (specifically your postal address, telephone number(s) and email addresses)
- Financial data which includes bank account and payment card details
- If you donate or make a payment for a booking we'll ask you for your bank/credit card details
- Transaction data which includes details about payments to and from you
- Marketing and Communications data which includes your contact preferences in receiving marketing from us and your communication preferences
- Job application data which includes references from third parties chosen by you if you apply for job at Ufton or as a volunteer. Where applicable or appropriate, details about your connection to Ufton and the areas of work we have impact e.g. education, sustainability or deprivation
- Aggregated data which includes such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or looking at which geographic areas our visitors travel from, or which age groups visit us. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.
- Profile data which includes your username and password, purchases made by you, your interests, certain health information such as disabilities, preferences, feedback and survey responses. At times, we also collect demographic information from publicly available sources.



We ask for this information so that we can:

- Provide you with services and information you've requested
- Enable staff recruitment, retention and process payments, including pension fund payments
- Respond to any questions or feedback you might have about our work
- Administration of memberships
- Send you information about our work that we think you'll be interested in
- Process payments or donations you make to support our work, including Gift Aid
- Keep up to date with the relationship you have with us
- Understand how we can deliver more cost-effective fundraising campaigns as well as improve the services that we offer to people who get in touch with us
- Detect and reduce fraud
- Understand why supporters have chosen to support us

The legal conditions we rely on to process your personal data

The General Data Protection Regulation (the GDPR) says we must have a lawful basis to process the personal information of our supporters. Our legal basis for processing data includes:

- Consent and Legitimate Interests of the data subject so that we can keep you informed about news, events, activities and services offered by Ufton.
- Processing is necessary for carrying out contracts or legal obligations.
- Sharing of information with partners or third parties is only done so where consent has been provided.
- However, we may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protection and minimise credit risk.
- Please be advised that we do not reveal information about identifiable individuals to our stakeholders without consent from the data subject, but we may, on occasion, provide them with anonymised information.

We rely on the following four legal conditions to process personal data:

Consent

We rely on consent to:

- send supporters information by email and SMS about our work
- process "special category data" (e.g. information relating to someone's dietary requirements, health or ethnicity)
- manage the relationships we have with our case studies – this ranges from the use of their photograph through to sharing their story with the media
- Contact schools or Voluntary and Community organisations by email with different opportunities for support and funding from Ufton and other relevant organisations e.g. Ufton bursaries/grants

Consent can be withdrawn at any time.



Legitimate Interests

Under the GDPR, we can process personal information under the condition of “Legitimate Interests” providing that:

- the activity is necessary to fulfil our objectives
- the activity meets with the expectations of the person who the personal information relates to
- the activity doesn't override individual's rights and freedoms
- the individual has been given an opportunity to object to the processing

Before carrying out any activity that relies on legitimate interests, we will complete an assessment to determine the potential impact and ensure that necessary safeguards are in place to protect your rights. Unless the law requires it, we won't use the information you give to us for activities where the impact on you overrides our legitimate interests.

In order and to achieve our legitimate interests and long-term objectives, we believe it's necessary to:

- contact supporters through post, phone and social media about our work – we believe we can cultivate long-term support for our work by keeping our supporters up to date with information about how they can support us by post and phone. You can opt out of hearing from us in these ways at any time and we don't call people who are registered with the Telephone Preference Service (TPS).
- contact schools by post and phone to tell them about what we do and the products we have available for them to book
- respond to supporter enquiries, requests for information and acknowledge the donations we receive
- process donations and payments
- build profiles of our supporters– we believe it's necessary not only to ensure that we target our resources in the most cost-effective way possible but that our supporters receive relevant and timely communications. We may therefore analyse and build profiles about supporters based on the nature of their support. For more info about our use of profiling, refer to the profiling section. You can opt out of us using your personal information in this way at any time
- carry out market research to review the success of our campaigns
- carry out quality assurance monitoring to ensure compliance with the Code of Fundraising Practice
- contact prospective corporate supporters about supporting our work– this gives us the opportunity to raise vital funds more quickly and reach out to audiences who might not otherwise be aware of our work
- contact schools and couples who marry at Ufton via phone and post to carry out quality assurance monitoring to ensure we have fulfilled our contractual agreements for Ufton Weddings and Ufton Court Educational Trust
- contact MP's about our work– this helps to ensure that improvements to the way in which education, sustainability and deprivation are at the heart of the political agenda
- co-operate with non-statutory third parties on complaint investigations– your data might need to be processed as part of an investigation undertaken by a non-statutory regulator (e.g. the Fundraising Regulator) to review potential breaches of the Code
- make improvements to our database
- manage staff usage of our IT systems

We believe that all these activities are necessary for us to continue being an effective and efficient charity. This, in turn, will help us to achieve our charitable objectives more quickly.



Performance of Contract

We process data to fulfil the following contractual obligations and where we need to perform the contract we are about to enter or have entered with you:

- creating and managing staff IT accounts
- managing your school booking with us from the point of contacting us about information about our offering to completing your feedback with us
- managing your wedding booking with us from the point of contacting us about a viewing to your wedding day and gaining your feedback about your experiences of Ufton Weddings
- managing school bookings with us from the point of enquiry to gathering feedback after your visit.
- claiming direct debit and standing order donations on days specified by the donor
- employee relationship management – this includes dealing with issues like grievances and disciplinaries, flexible working, performance and appraisals, paying salaries and staff benefits (e.g. childcare vouchers etc), ensuring that requirements for new starters/leavers are met and developing staff and volunteers through training and development programmes
- employee recruitment and resourcing – this includes shortlisting, interviewing, offers of employment and reference checking
- employee retention – this includes appraisals, payments, training, policy compliance
- paying invoices sent to us by third-party suppliers for services they have carried out on our behalf
- monitoring 'Discussion Forum' posts to ensure that users are abiding by the forum's community guidelines

Legal obligation

We process data to fulfil the following legal obligations:

- Co-operating with statutory third-party regulators (e.g. Charity Commission or Information Commissioner's Office) on investigations
- Administration of legacies – including contacting solicitors, funeral directors as well as the individual's families
- Responding to supporters who want to exercise their data protection rights
- Processing Gift Aid claims –including giving necessary information to HMRC
- Health and Safety –this involves training staff on health and safety regulations and speaking to them about obtaining tailored equipment to satisfy their needs if required
- Income Reconciliation – we need to make sure that the money we receive is matched to the corresponding supporter information
- Statutory Registers and Returns – we're required to keep statutory registers up to date for organisations like the Charity Commission and Companies House



For Ufton Court Limited and Ufton Court Educational Trust and Ufton Court Limited, we process your data in the following ways:

Purpose or activity	Type of data	Legal basis for processing data
Register your booking and account with us	Identity and contact	Performance of a contract
Organise your viewing/pre visit	Identity and contact	Performance of a contract
Manage your booking	Identity and profile	Performance of contract
Manage payments	Contact and financial	Performance of contract
Notify about changes to terms or privacy policy	Contact	Legal obligation
Contact you for feedback	Identity and profile	Performance of contract
Tell you about our bursary/grant scheme or funding you can access	Identity, contact and profile	Legitimate interests
Gather information about children participating in our education programmes to support their safety and wellbeing	Identity and special category	Consent
Tell you about our school programmes, availability and booking process	Identity, contact, profile and marketing	Legitimate interests and consent
Invite you to take part in research to help us evidence our impact	Identity, contact, profile and marketing	Legitimate interests and consent
Sign up for any event	Identity and contact	Legitimate interests and consent

Marketing

We rely on our legitimate interests (see The legal conditions we rely upon to process personal data section) to contact you by post and, unless you're registered with the Telephone Preference Service (TPS), by phone to tell you about:

- Ways in which you can support us from taking part in an event, fundraising or donating
- Our school programmes, bursaries, availability and booking process
- Our full offering through Ufton Court Limited and products you might like to add to your wedding or event package

If you've given us consent, we'll also contact you by email and SMS (text message). You can withdraw your consent or change the way that we contact you any time, using the contact details below:

Email us: enquiries@ufton.org.uk

Telephone us: 0118 983 2099

Write to us: Ufton Court, Green Lane, Ufton Nervet, RG7 4HD

We use "email tracking" to review the success of our email campaigns – an invisible pixel is embedded in the emails that we send which tells us how many people have opened the email. This process also logs destination email addresses, IP addresses and email client types. You can "opt out" of tracking by banning html emails.



Social Media and Digital Advertising

We use two techniques to keep in touch with you through digital channels:

Pixel-based retargeting

When you visit our website, a pixel (or JavaScript) is placed on your browser, making it "cookied". When you subsequently leave our site, the cookie notifies "retargeting" platforms (like Facebook etc) to present you with adverts about our work and how you might be able to support us. You can "switch off" this functionality by changing your browser settings.

List-based retargeting

If you have given us permission to receive email communications from us, we sometimes upload your email address (in an encrypted format) to social media platforms such as Facebook and Twitter. Those platforms will then show our digital advertising campaigns to you as well as identifying audiences with similar interests to yours.

If you don't want to receive this type of targeted advertising on social media, you can opt out at any time by emailing enquiries@ufton.org.uk or by calling 0118 983 2099. Please note that if you do choose to opt out, it will not stop our advertisements being shown to you on a randomised basis.

Our use of profiling and targeted communications

We want to send you information that we think you'll be interested in. We believe that this helps to improve your experience of being one of our supporters, guests or visitors and ensures that we're using our charity resources in the most effective ways possible.

From time to time, we may use profiling and screening techniques to help us ensure communications are relevant and timely and to provide the best experience we can for you. This enables us to raise more funds, more quickly and so support the wide and varied work that takes place at Ufton.

We may analyse mass data from our database so that we can understand our supporters. For example, we use systems to create supporter categories within our database based on postcodes and we will, where appropriate, store this information on your record. We will also use broad demographic information such as statistics and analysis from third parties to better understand how our own supporter base compares to the general population. This helps us to decide who to send our communications to and is useful to ensure the communications you receive are relevant to you.

Philanthropy

For a small number of our supporters, we may use basic research tools from time to time to estimate potential interest in supporting us. This helps us identify who might have an interest in the work that we do and support our cause further by being involved in the events that we hold or by providing a substantial gift to further our work.

We may use information about you from publicly available sources such as online registries, websites, media, or personal introductions in order to understand more about your interests and preferences so that we can tailor our communications such as telling you about the things you are likely to be interested in, letting you know of ways to fundraise with us which are relevant to you and making sure that we only talk to you about a financial level of giving that is appropriate to you. We may do this by looking at your career information, peer networks, demographic information, hobbies and interests or other information.



When building information about our donors or potential donors, we may look at how you have supported us in the past, your connection to any of the issues we are trying to address (e.g. education, sustainability or deprivation), through which channels you have communicated with us, and we analyse geographical, demographic and publicly-available information about you such as your age, financial circumstances, any previous donations that you made, where you live, listed Directorships and your estimated wealth to understand how likely it is you would be interested in supporting us further.

Our research findings are only accessible to the fundraising and Senior Leadership Team and are stored on the supporter record within our folders.

We sometimes ask existing supporters whether they would be prepared to open their networks up to us. An existing supporter may tell us about an individual previously unknown to us and facilitate an introduction. In this scenario we would advise our existing supporter about our data responsibilities and ask them to ensure that the individual in question is happy for an introduction to take place. Following the introduction, we would direct the individual to this privacy policy and confirm their marketing consent preferences before communicating with them further.

This also allows us to send communications based on the supporters' individual circumstances which, in turn, means that we can target our resources more effectively – something that donors tell us is a key priority for them. There are no other consequences of the profiling activities that we conduct.

You can object to us processing your personal information this way by contacting 0118 983 2099 with your request and we'll ensure that your wishes are respected.

Collaborative Working

Ufton strives to work collaboratively, and we therefore aim to work in partnership with organisations' whose values and aims align with our own. These collaborative partnerships could include working with:

1. Universities to help monitor the impact of our charitable goals or give us advice
2. Other charitable organisations, community/voluntary groups or funding bodies to further our charitable goals
3. Schools to help us reach as many children as possible
4. Private consultants who are experts in their area of work e.g. brand, training, education or tech

Sharing your experiences

Some of our supporters, teachers or children who have come to Ufton choose to share their experiences with us. Not only does this give us invaluable insight into the impact of our work but also helps to highlight the urgent need for us to address the needs of children. Couples who have married at Ufton may choose to share their stories with us too which helps us to market our weddings more effectively and share the impact that Ufton Court Limited has on our wider charitable objectives since 100% of profits are donated to our work with children.



Supporters, teachers, children, donors and couples who share their experiences may:

- agree to share their story with a journalist
- give us permission to share their story on our social media channels and/or our website
- agree to share their experience when taking up opportunities as a member of our Champions Programme

If we have the person's consent, we'll share the information that they give to us at events, in materials promoting our campaigning and fundraising work, with journalists and/or in press releases and in publications like our annual report.

We also regularly review the types of supporter who provide us with their stories so that we can ensure the views and experiences we hear adequately represent diversity of our work and the children who attend Ufton.

Information about what we do at Ufton

People can order our information in printed or digital publications through our website. We will collect your contact details so that we can send you this information. If you give us your consent, we'll keep a record of your request along with your personal details, in accordance with our data retention policy. This information will be stored securely on our website and database.

Donations

We encrypt credit or debit card details on our online donation page which means that they can't be intercepted and subsequently accessed. We redact all bank details that are provided to us during the course of setting up Direct Debits and do not store credit card details. We use CAF to process donations made to us online and via telephone. They retain a copy of the debit/credit card transaction securely on their systems.

Analysing how people use our website

Our website uses Google Analytics, to look at how people use the site. Google Analytics use "cookies" which are text files placed on your computer – they help us to see how long people stay on our site and which of our pages are the most popular as well as the least visited. This in turn helps us to make the site as relevant and as useful as possible.

The information produced by the cookie about how you use the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. The company then uses this information to compile visitor reports for us about website activity.

Google will transfer this information to third parties if required by law, or where such third parties process the information on Google's behalf. Google won't link your IP address with any other information held by Google.

We also use behavioural analytics such as heatmaps and screen recordings to produce anonymous data to understand how certain pages of the website are being used and accessed by visitors. We use the anonymous data provided to measure trends and statistics so that we can improve the website and provide more meaningful content.

You can block cookies by selecting the appropriate settings on your browser. However, please remember that our website might not work as well as it should if you do this. We may also use custom URLs to track the source of conversions on our website, to help us ensure our communications are as relevant as possible.



Links to other websites

Our website provides links to websites operated by other organisations. These organisations have their own privacy policies so please review these if you want to find out more about how they protect your privacy.

Keep children's data safe

When children and young people attend our programmes, they do so as part of a visiting organisation or school. Our relationship is held with the organisation or school and not individual children and their parents, guardians or carers. Parents, guardians or carers give consent to organisations or schools to share their child's data with us.

To facilitate a safe visit, we may need to process children's data, including special category data to support children's physical and emotional needs and their progression through our programmes, that could also link to their support plans from their school. We prefer to anonymise children's data but there are cases where this is not possible e.g. food allergies or bursary/grant applications. Where data is not anonymised, it is stored securely and only visible to the teams for the performance of their roles.

From time to time, we participate in impact studies with accredited organisations and may need to share anonymised data about how children are progressing through our programmes. This is done to track and evidence the efficacy of our programmes, helping us to serve children better now and in the longer term.

Our campaigns don't specifically target children. However, there might be occasions where children will get in touch with us. They might, for example want to fundraise for us, donate to support our work, want to share their experiences of their time with us or get in touch to speak to one of our team. Wherever possible, we aim to get consent from a parent or guardian before we collect information about children. However, in cases where we become aware that someone we are engaging with is below 16 only after we have already collected their data, we'll ask for the consent of a parent/guardian to continue communicating. If we're unable to get this, we'll stop all contact with the child concerned and delete their information from our systems.

If you are a parent or guardian and are concerned that we may be processing personal data related to your child, please email enquiries@ufton.org.uk to let us know.

To comply with our duty of care and safeguarding, we may need to pass some information raising safeguarding concern with the authorities. Where possible we seek consent from you. However, when this is not possible, we apply the following lawful basis:

- Where an individual's life may be at risk we may process the data according to the UK GDPR Article 6(d) where such processing is vital to the individual's life
- Where an individual or child is at risk – UK GDPR Article 6(f) legitimate interest, Article 9(g), substantial public interest, DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk
- Where an individual is at economic risk – UK GDPR Article 6(f) legitimate interest, Article 9(g), substantial public interest, DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of economic well-being of certain individuals



How we keep your personal data safe

We're committed to keeping any data you provide to us safe and secure. All our staff therefore undergo comprehensive data protection training when they first start working for us.

Our online forms are encrypted which means that the details on them can't be accessed while the information is transferred to us. Our computer network is provided by Bluecube Technology Solutions and is routinely monitored by our providers.

If we use external companies (refer to the "Who we share personal data with" section) to deliver fundraising campaigns on our behalf. Before working with them, we carry out thorough checks to ensure that they're compliant with data protection laws and ensure the correct non-disclosure agreements (NDAs) are in place.

Data retention

We keep personal data only for as long as it's necessary and in accordance with our internal data retention policy. In some cases, we're required by law to keep personal information for a specific length of time. For example, we're required to keep information relating to our employees for a minimum of 6 years after they've left the charity. We are also under a statutory obligation to store financial records for 6 years, after the year end.

However, their contact information is kept on our database in case the individual engages with us in another way e.g. they choose to make a donation or take part in an event.

In cases where the law is less specific about how long data should be kept for, we carry out an assessment based on the following factors to determine how long we need to keep it:

- the type of personal data concerned (e.g. is it "special category" data?)
- the nature and length of the relationship with the individual concerned
- the stated contact preferences of the individual

Following that assessment, all personal information no longer required will be deleted. However, we'll retain basic information (such as a supporter's postcode and transactional history) and securely archive this. We believe it's important to keep basic information of this kind in case someone leaves a gift in their Will to us and we're required to evidence the nature of their support if it's contested.

For Ufton Court Limited:

- Following your viewing, we will retain your personal information for up to 6 months, giving you time to decide on your chosen wedding venue. After this period your personal information will be deleted, unless you have provided us with consent to contact you via email or sms.
- Following your wedding, we will retain your personal information and your contract with us for 7 years, in line with our data retention policy. Your data will then be deleted unless you consent to receiving information from us to invite you to events, hear more about our charitable work or membership opportunities.



For Ufton Court Educational Trust:

- Following a visit to our site and participation in any of our educational programmes through either Ufton History, Ufton Adventure, Ufton Outdoors, The Nest or any future educational provision, we will retain the data of Schools and Community Organisations for a period of 7 years.
- Child protection and safeguarding records, including disclosures, incident reports, investigations, and risk assessments, shall be retained for a period of at least 25 years from the date the child reaches 18 years of age, or for a longer period if required by law or specific legal obligations, such as cases involving criminal investigations or court proceedings. This means, for Ufton, we will retain this information permanently.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents and contractors who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Who we share your personal data with

We may use external direct marketing companies to run campaigns on our behalf through the post and by phone. We may also use the services of external mailing houses to send out information in the post on our behalf. We carry out checks to ensure that our suppliers will treat your data with respect and we have contracts in place with all of them which state that:

- they can only use the personal information we have sent to them for the purposes we've outlined
- their employees must be subject to a "duty of confidence" when using that data
- they must follow robust security measures to ensure that the data we share with them is kept secure
- they must delete or return all data to the controller as requested at the end of the contract
- they consent to regular audits and inspections and provide us with any information we might need to ensure they're re complying with data protection laws

The fundraising suppliers that we use vary from time to time. To request an up-to-date list of the suppliers that we're currently working with, please email fundraising@ufton.org.uk

We'll never sell your data or share it with any third parties for their own marketing purposes.

We may need to share data under special circumstances e.g. when you fill in an online petition, we will share mandatory personal details such as your name and postcode with the target of the petition. We will also need to share personal data we are under a legal obligation to do so. This includes disclosing your details if required to the police, regulatory bodies or legal advisors.



Your rights under data protection

Data Protection legislation gives you more control over what happens to your personal information. Under this legislation you have the right to:

- be given clear, transparent and free information about how your data will be used
- access your personal data so that you can see how your personal information is being used by us
- have your personal information updated and corrected
- obtain and reuse the personal data you have given to us for your own purposes
- request that we permanently delete or remove your information where there is no “compelling” reason for us to keep it
- request that we don’t use your personal data for specific purposes and, unless we are under a legal or contractual obligation, we must respect your wishes

Data Protection legislation also prohibits us from using solely automated technologies to build profiles and make decisions about people who support us which will have “legal or similarly significant effects”, unless:

- it’s necessary to fulfil a contract
- it’s been authorised by a Union or Member state law; or
- you’ve given your explicit consent for your information to be used in this way

When carrying out other types of profiling, we need to tell you about how your information will be used and you can object if you don’t want to be included in that process. We’ve outlined our approach to profiling and ways in which you can opt out.

If you’d like to exercise any of the rights outlined above, please contact us by emailing enquiries@ufton.org.uk. We’ll respond to your request within 5 working days with an outline of the next steps.

Changes to this notice

Ufton reserves the right to amend this policy from time to time without prior notice. If we make any significant changes to the way in which we process your information, we’ll make the required changes to this Privacy Notice and will notify you so that you can raise any concerns or objections with us. When making less impactful changes, we’ll update this notice and post a summary of the changes on our website.

Legal Disclaimer

Ufton will take all reasonable care, in so far as it is in our power to do so, to keep the details of your order and payment secure, but in the absence of negligence on our part we cannot be held liable for any loss you may suffer if a third party procures unauthorised access to any data you provide when accessing or booking on our website.

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