

Privacy Notice for Business Contacts

What is the purpose of this document?

The Cranfield Trust collects and processes personal information about you during and after your relationship with us in order to manage that relationship. We are committed to being transparent about how we collect and use your data to meet our obligations under the UK General Data Protection Regulation (GDPR).

What personal information do we collect and how is it used?

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will only process your personal information where we have a legal basis for doing so, as described in the table below.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

| Data we collect | What we use it for | Legal basis for processing data |
|---|--|--|
| Names, addresses, telephone numbers, email addresses (for individuals contacted in their professional capacity), eg business cards | To contact you in connection with a specific enquiry, project or funding opportunity; to keep you updated on our services or activities and events | To fulfil our legitimate interest as a fundraising charity or to fulfil our charitable objects |
| Information gathered from business and social media sources in the public domain, eg web, LinkedIn, Companies House or Charity Commission, business directories or other sector-related sources | To build a picture of your organisation's background, aims and objectives in order to pursue potential business relationships | To fulfil our legitimate interest as a fundraising charity or to fulfil our charitable objects |

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How is your personal information collected?

We collect information when we establish a relationship with you, for example at networking meetings or events. We may sometimes collect additional information from third parties including business and social media searches such as LinkedIn, and publicly available sources such as business directories and Charity Commission. We may collect personal information in the course of our activities throughout the period of our relationship with you.

Automated Decision Making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Artificial Intelligence (AI) technologies

With the exception of your name and email address, we will not share nor process your data with any AI technologies or processes outside the Trust without your consent. Common tools we may use will include AI support for drafting emails or letters or AI transcription of webinars, meetings and calls. As a 'Data Subject' you have the right to access any data we hold on you, including any content that has been generated, processed or analysed by AI – we will always make it clear what information this relates to.

Who has access to your data?

Your information may be shared internally, including with staff members responsible for managing and administering fundraising, projects, events and marketing activities.

We may also share your data with our third-party service providers, for example in connection with supporting our IT network (including remote support). Your data will be stored and processed using a CRM system provided by Salesforce who are also a data controller for the purposes of data protection legislation. You can find out more about what Salesforce does to protect your data by visiting https://www.salesforce.com/uk/company/privacy/full_privacy/ and <https://www.salesforce.com/uk/company/privacy/>.

We require third parties to respect the security of your data and treat it in accordance with the law. We will share your information with third parties where we have a legal basis for doing so. In particular, we share information where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest (provided that processing does not outweigh your rights and freedoms). All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

Your personal information may be transferred to or stored in countries outside the European Economic Area (for example, where we use a service provider located outside the EEA). We will ensure that any international transfer of personal information is safeguarded as required under data protection law. Please contact us if you would like further information.

Data Security

The Cranfield Trust takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, or subject to unauthorised access. Where necessary, we implement appropriate network access controls, user permissions and encryption to protect data.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods, archiving and destruction policies for different aspects of your personal information are available in our retention policy which is available from the person responsible for data protection.

Your legal rights

As a data subject, you have a number of rights relating to your personal information including the right to request access to, deletion or correction of your personal information; to object to our use of your personal information; to request that we transfer your personal information to you or another data controller; and not to be subject to automated decisions. You can find further details of your rights at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If we do need to process your personal information on the basis of consent, you have the right to withdraw this consent at any time which you can do emailing mydata@cranfieldtrust.org. Please understand that we may need to verify your identity before we can process your request.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner (ICO).

Accessing your data

You will not have to pay a fee to access your personal information. However, if we think that your request is unfounded or excessive, we may charge a reasonable fee or refuse to comply with the request. We may need to confirm your identity to ensure that personal information is not disclosed to a person who has no right to receive it.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Queries and Further Information

The Cranfield Trust (Court Room Chambers, 1 Bell Street, Romsey, SO51 8GY) is the **Data Controller**.

For any queries, please contact **James Lennard, Head of Finance, Administration & Control** (mydata@cranfieldtrust.org).