

# Privacy Policy

At **Spinnaker Trust Ltd**, we are committed to protecting your personal information and being transparent about how we collect, use, and store it. As such, we have written this Privacy Policy in accordance with UK GDPR and Data Protection Act 2018 (as amended by the Data Use and Access Act 2025) , to let you know what sort of information we hold about you, why we have it and what we will do with your details.

This policy applies to all the websites we operate, our use of emails and social media, paper-based communications and any other methods we use for collecting information. Spinnaker Trust operates the following websites:

[www.spinnaker.org.uk](http://www.spinnaker.org.uk)

[www.smsc.org.uk](http://www.smsc.org.uk)

## 1. Who We Are

Spinnaker Trust Ltd is a registered charity, based at 40 Lubbock Road, Chislehurst, Kent, committed to delivering and distributing resources for Collective Worship and RE lessons, supporting schools and equipping schools workers.

Spinnaker Trust is the “data controller” of the personal information you provide to us. This means we decide how your data is used and protected.

## 2. What Information We Collect & Why

We will only ever collect information that is necessary, including data that will be useful to improve our services. We collect information about supporters, churches, the schools we visit/use our resources, volunteers and employees. This may include the following types of personal data:

- **Contact Information:** To communicate with our supporters and service users.
- **Donation Information:** To process donations, maintain records and meet legal obligations.
- **Volunteer or Employee Information:** To recruit and manage volunteers and employees.
- **User Information:** To deliver and keep a record of charitable services provided to beneficiaries.
- **Website Usage Data:** To improve our website and communications.

We will never sell your data and we will never share it with another company or charity for marketing purposes. It will only be shared where we are required to by law.

### 3. How We Collect Your Information

We collect information when you:

- Donate to us
- Sign up for our newsletter or events, or to access our resources
- Volunteer or are employed by us
- Contact us via email, phone, or through our website
- Visit our website (via cookies and analytics tools)

### 4. Lawful Basis for Processing

Under UK Data Protection Law, we must have a “lawful basis” for collecting and using your personal information. You can find out more about lawful bases on the ICO’s website: [www.ico.org.uk](http://www.ico.org.uk). We collect information using the following lawful bases:

- **Consent:** We only collect information where consent has been given or the details are publicly available. Consent can be withdrawn at any time.
- **Legal Obligation:** Where we are required to keep information by law.
- **Legitimate Interests:** For fundraising, volunteer and employee management, and service delivery.
- **Contract:** When entering into a volunteering or employment agreement.

### 5. Sharing Your Information

We will never sell your personal data. We may share your information with:

- Service providers acting on our behalf (e.g. payment processors, mailing services)
- HMRC (for Gift Aid claims)
- Regulators or authorities if required by law (for safeguarding purposes)

All third-party service providers are required to respect the security of your data.

### 6. How We Store Your Data

We store your information securely and take appropriate steps to protect it from unauthorised access or disclosure. All records are stored securely on computers located in the UK and on reputable cloud-based storage systems. All personal data is password protected if held on a computer, or kept in secure locked storage if in paper format.

## 7. How Long We Keep Your Data

Data is retained only as long as necessary for our purposes or as required by law. Different types of records will be kept for different lengths of time. In general these are:

Consent only records – 2 years

Financial records – 7 years

Pension records, HR records of dates worked, posts held etc, Safeguarding records – permanently (50 years)

## 8. Your Data Protection Rights

You have the right to:

- Access the personal data we hold about you, including where we got the information from and who we share it with.
- Request correction or deletion of inaccurate or incomplete data
- Request deletion of your personal information
- Restrict how we can use your personal information
- Object to the processing of your personal data
- Withdraw consent at any time (where applicable)
- Lodge a complaint with the UK Information Commissioner's Office (ICO)

To exercise your rights, please contact us using the following details:

✉ Email: [spinnaker@spinnaker.org.uk](mailto:spinnaker@spinnaker.org.uk)

☎ Phone: 0203 764 8503

📍 Address: 40 Lubbock Road, Chislehurst, Kent BR7 5JJ

If you make a request, we must respond to you without undue delay and within one month.

## 9. Links to Third-Party Websites

Some pages on our website may include content from third-party websites that we believe may be of interest. This policy only governs our websites, and we are not responsible for the policies that govern third-party websites, even where we have provided links to them. If you use any link on our website, we recommend that you read the policies of that website before sharing any personal or financial data.

## 10. Social Media Sites

We operate social media pages on Facebook, Instagram, YouTube and X. Although this policy covers how we will use any data collected from those pages, it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

## 11. Cookies and Website Tracking

Our website uses cookies to improve user experience and analyse traffic. You can manage your cookie preferences through your browser settings. For more information, see our Cookie Policy.

## 12. Changes To This Policy

We may update this Privacy Policy from time to time to reflect changes in technology or legal requirements. The latest version will always be available on our website, along with our Cookie Policy.

## 13. Questions or Concerns

If you have any queries about how we use your data, please contact us using the details above. If you are not satisfied with the response given by us, you can contact the ICO as follows:

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline Number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

All Spinnaker Trust policies and procedures can be found on the team page of our website: [www.spinnaker.org.uk/policies](http://www.spinnaker.org.uk/policies)

**Approved by the Board of Trustees on: 08/10/25**  
**Date last updated: August 2025**

Date created: September 2018  
Reviewed: August 2025