



**DISCOVER @ KEPPLEWRAY**

DISCOVER ADVENTURE. DISCOVER LIFE

## **The Keppleway Trust - Privacy Statement**

The Keppleway Trust (“The Keppleway Centre”, “Keppleway”, “We”) is an educational residential outdoor centre founded and run upon Christian principles.

Keppleway values everyone who engages with us by whatever means, and we do all we can to protect your privacy and to make sure the personal data you provide us with is kept safe and only used for purposes you have agreed to.

This policy explains how we collect data, how we use and store information and what it means for you.

### **What information do we collect?**

Directly with us:

We collect personal information each time you deal with us. For example, when you make a booking, provide information about special needs of those coming, opt in for our regular news, request information or otherwise provide your personal details.

From website interaction with us:

We collect non-personal data such as IP addresses, details of pages visited and files downloaded. Website usage information collection includes the use of cookies. See the section on cookies below.

Indirectly from third parties

We collect information from 3rd parties such as bank payment details if you book with us or make a donation, or references if you are applying for a job.

Where you give your permission to other organisations

We may collect information that you make publicly available on, for example, Twitter, Facebook, LinkedIn or similar organisations. You may wish to check their privacy policy to find out more information on how they will process your data.

From publicly available data

We may collect information from Companies House, Charity Commission and information published in articles, newspapers or blogs.

Sensitive data

Where you provide the information, we may collect sensitive personal data, including, but not limited to, your religious beliefs, or your physical or mental health.

### **What do we do with it?**

We may use the personal data we collect to:

Provide you with the service you have requested;

Keep you up to date on news and stories about our work;

Ask for financial and non-financial support;

Process donations you give us, or to support your giving to us, including Gift Aid;  
Provide information packs, for example, events leaflets or magazines you have requested;

Provide a personalised service, such as customised website content or personalised emails;  
Keep records of your relationship with us, for example, questions you have asked or complaints you have made;

### **Basis of processing your data**

Information supplied to us on or after 25th May 2018

We will process your personal data on the basis of the consent you provided us with. You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email as shown in the section 'Your choices and telling us when things change' below.

Information supplied to us prior to 25th May 2018

We may continue to contact you by email where you have previously given us your consent. We may also contact you by telephone or post where we have a legitimate interest to do so. For example, where you have previously made a donation to Keppleway we may continue to send you information about the work your donation is making possible or other work we may wish to do. Where you have previously asked us not to contact you in this way we will continue to respect your contact preferences. You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email as shown in the section 'Your choices and telling us when things change' below.

### **Applying for a job or volunteering with us**

Where you provide personal data and sensitive personal data when applying for a job with us, such as the information on your CV, we will process, store and disclose the personal data we collect to:

Support the recruitment process;

Enable you to submit your CV, apply online for jobs and to subscribe for alerts about job types of interest to you;

Answer any questions you may have;

Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests.

### **How and where we store your information**

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the charity's monitoring of income.

## **Questions**

If you have any questions about our data retention, please contact us in writing at:

Data Protection Officer  
The Keppleway Trust  
Broughton-in-Furness  
Cumbria  
LA20 6HE

Or email to: [stay@keppleway.org.uk](mailto:stay@keppleway.org.uk)

## **Security**

We ensure that we have appropriate technical controls in place to protect any personal data you provide.

We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

We may make use of external companies to collect or process personal data on our behalf. When we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear, and carry out periodic reviews. When we do use external companies, we remain responsible for the storing and processing of your personal data.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

## **Where we store your personal information**

We use cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We adopt the Information Commissioner's approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information.

## **When we share your information**

We do not share or swap your information with any other charities.

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

## **Our service providers and third parties**

Occasionally we may employ agents to carry out tasks on our behalf, such as processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

### **What are cookies?**

We collect data using cookies. A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website, for example, traffic data, location data, device information, the date and time of your visit and the pages that you visit. The use of cookies is an industry standard for most major websites.

Keppleway works with a number of third-party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting purposes so we can improve the way we communicate.

We use websites such as YouTube to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third-party website for more information about their cookies and how to manage them.

Keppleway also uses third party suppliers such as Facebook and Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts.

As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your cookie settings (see above).

### **Preferences**

You can change your preferences on what you receive from us, including marketing and fundraising materials, or how we contact you, by mail, phone or email, at any time.

You can do so by:

Email us on: [stay@keppleway.org.uk](mailto:stay@keppleway.org.uk)

Write to us at:

The Keppleway Trust  
Broughton-in-Furness  
Cumbria  
LA20 6HE

### **Updating your details**

We do appreciate it if you keep your details up to date. You can do so in the same way as updating your preferences (above).

We may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form.

We will not use these sources to create data that you have chosen not to provide, for example, if you have left a telephone number blank; nor will we automatically update changes of address. We will normally only update your address when you tell us it has changed. However, if you are a regular giver, continuing to give regularly, and items such as Transform are returned to us, we may use external sources to update your address details so that we may keep you informed on how your money has been spent through our news and stories.

### **Telling us to stop processing**

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at:

Data Protection Officer  
The Kepplewray Trust  
Broughton-in-Furness  
Cumbria  
LA20 6HE

### **Access to your information**

Your rights under DPA 1998 and GDPR

You have the right to request details of the information we hold about you. To receive a copy of the personal information we hold please write to our Data Protection Officer at the address given above. There is no charge for this service. We will respond within one month of receiving your letter.

For more information about your rights under the General Data Protection Regulation you can visit the website of the Information Commissioner's Office.

[Changes to Kepplewray's Privacy & Security Policy](#)

[Changes to this Policy](#)

This policy was last updated 17th May 2018. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy, we will show this clearly on our website. By continuing to use our website you will be deemed to have accepted these changes.