



Fairfield Trust

External Privacy Notice

Fairfield Trust takes data privacy seriously. We recognise and value the trust that individuals place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from visitors to our websites.

Fairfield Trust has different privacy notices depending on your relationship with us. This notice is for visitors to the website and to us in person and includes customers of the Fairfield Animal Centre, Café, The Weavers pub and visitors to the College.

If you are a student (or the parent or carer of a student) a different privacy notice applies. If you are an employee or a prospective employee a different privacy notice applies. These can be accessed via the Trust website.

This Privacy notice aims to help you understand how we collect, use and share personal data.

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By providing your personal data to us (whether via our website, by email, in person or over the phone), you agree to the processing set out in this Privacy Notice. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when we collect personal data from you.

Please note: This Privacy Notice does not apply to, and Fairfield Trust is not responsible for, any third party websites which may be accessible through links from this website. If you follow a link to any of these third-party websites, they will have their own privacy policies and you will need to check these policies before you submit any personal data to such third party websites.

This Privacy Notice aims to help you understand our personal data collection, usage and disclosure practices by explaining:

1. What personal data we collect about you

We may collect and process different types of personal data in the course of operating our business and providing our services. These include:

- Basic personal details such as your name and where relevant your job title;
- Contact data such as your telephone number and postal or email address;
- Bank account and payment card details and billing address
- Current and past purchases and orders made by you
- Your communication and marketing preferences
- The Personal Data contained in any other communication you make with us
- Website usage and other technical data such as details of your visits to our websites or information collected through cookies and other tracking technologies;
- Personal data provided to us by or on behalf of our [*customers*] or generated by us in the course of providing our services;
- Data that you may provide to us in course of registering for and attending events or fundraisers;
- Any other personal data relating to you that you may provide.

2. How we obtain the personal data about you

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, browsing our sites, paying for items or services or via other direct interactions with us such as through our social media channels;
- Where we monitor use of, or interactions with, our websites, any marketing we may send to you.

3. How we use your personal data

We will only use your personal data where we are permitted to do so by applicable law. Under UK data protection law, the use of personal data must be justified under one of a number of legal grounds. The principal legal grounds that justify our use of your personal data are:

- Contract performance: where your information is necessary to enter into or perform our contract with you.
- Legal obligation: where we need to use your information to comply with our legal obligations.
- Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.
- Consent: where you have consented to our use of your information (you will have been presented with a consent form or facility in relation to any such use and may withdraw your consent through an unsubscribe or similar facility).

We may use your personal data in the following ways. In each case, we note the grounds that we rely on to process your personal data. **To facilitate use of our websites and to ensure content is relevant** – to respond to requests for information or enquiries from visitors to our websites and to ensure that content from our websites is presented in the most effective manner for you and for your device;

Legal grounds: legitimate interests (to allow us to provide you with the content and services on the websites), consent, contract performance.

- **For marketing and business development purposes** – to provide you with details of new services, updates and invites to events where you have chosen to receive these. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us as set out in section 11 below;
Legal grounds: legitimate interests, consent.
- **For research and development purposes** – analysis in order to better understand your and our services and marketing requirements and to better understand our business and develop our services and offerings;
Legal grounds: legitimate interests (to allow us to improve our services).
- **To fulfil our legal, regulatory, or risk management obligations** – to comply with our legal obligations; to enforce our legal rights, to comply with our legal or regulatory reporting obligations and/or to protect the rights of third parties;
Legal grounds: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities).

Further details about the types of data and lawful bases are in the table at the end of this notice.

4. Who we share your personal data with

We may share your personal data with a variety of the following categories of third parties:

- Third parties who market for us, Laura White Freelance is one of our data processors (used for collection of personal data and marketing campaigns).
- Our professional advisors (e.g. legal, financial, business, risk management or other advisors), bankers and auditors;
- Our insurers and insurance brokers; and
- Third party service providers, to whom we outsource certain functions such as payment processing company, information and document management, office support, technology and IT services, word processing, photocopying and translation services (we have agreements in place with these service providers to protect the confidentiality and security of information including personal data shared with them).

We may also process your personal data to comply with our regulatory requirements or in the course of dialogue with our regulators as applicable, which may include disclosing your personal data to government, regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, or unless to do so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding.

5. How long we keep your personal data

We will retain your Personal Data only for such period as is necessary to perform the purpose(s) for which it was collected. In many cases this means that Personal Data will be retained for the duration of the time that we provide goods and services to you and then for a reasonable time thereafter in order to manage any problems, process any returns, manage our relationship with you, defend any claims, for tax purposes and/or

for any other record keeping purposes. This period is typically a period of not less than 6 years from the date of your last order or visit with us.

6. How we protect your personal data

We recognise that information security is an integral element of data privacy. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal data from unauthorised access, use, disclosure, alteration or destruction in accordance with data protection law requirements.

Information that you provide to us is stored on our own or our service providers' secure servers and accessed and used subject to our security policies and standards, or those agreed with our service provider IE MSA IT Support Limited.

Everyone at Fairfield Trust and any third-party service providers we may engage that process personal data on our behalf (for the purposes listed above) are also contractually obligated to respect the confidentiality of personal data.

7. What rights you have in relation to your personal data

If you have any questions about our use of your personal data, please feel free to contact us via the details provided in section 10 below. Under certain circumstances and in accordance with UK or other applicable data protection laws, you may have the right to require us to:

- provide you with further details on the use we make of your information
- provide you with a copy of information that we hold about you;
- update any inaccuracies in the personal data we hold;
- delete any personal data that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your information whilst a complaint is being investigated.

You may also ask us not to process your personal data for marketing purposes. We will inform you if we intend to disclose your information to any third-party service provider for this purpose. As indicated in section 4 above, you can exercise your right to prevent such processing at any time by using an unsubscribe facility or contacting us at shirley.raw@ffc.ac.uk

We are also required to take reasonable steps to ensure that your personal data remains accurate. In order to assist us with this, please let us know of any changes to the personal data that you have provided to us by contacting us at shirley.raw@ffc.ac.uk or by using any relevant facilities that we provide.

While it is our policy to respect the rights of individuals, please be aware that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and some of these rights may be limited (for example the right to withdraw consent) where we are required or permitted by law to continue processing your personal data to defend our legal rights or meet our legal and regulatory obligations.

If you contact us to exercise any of these rights we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal data or our response to any exercise of these rights, you have the right to complain to the Information Commissioner's Office (data protection regulator).

8. Who is the data controller of your personal data

Fairfield Trust is the data controller for your personal data.

9. How we use cookies and similar technologies

When you visit our websites, we may send a cookie to your computer. This is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. For details of the cookies employed by us, please see our Cookie Policy, which forms part of this Privacy Notice. We may also analyse website traffic to identify what visitors find most interesting so we can tailor our websites accordingly.

10. How you can contact us

If you have any questions about this Privacy Notice or how we process your personal data, please contact us by sending an email to: vicky.dunncliffe@ffc.ac.uk or by writing to:

Vicky Dunncliffe CEO
Fairfield Trust, 43 High Street, Dilton Marsh, Westbury, Wiltshire, BA13 4DL

Personal Data

- Name and address
 - Contact information (including telephone number and email address)
 - payment card details and billing address
 - Details of your purchase or order
 - Personal Data contained in any other communication you make with us
 - Delivery address
-
- Contact information provided voluntarily by you
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- Any "Special Categories of Personal Data" (Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data, data concerning health or data concerning your sex life or sexual orientation or other data volunteered by you) required to ensure we can deliver your product(s) and or deal with any specific concerns or enquiries raised by you.

Basis of Processing

Processing that is necessary to perform a contract or when taking steps in connection with a contract with you.

Processing based on your consent.

Processing that is necessary for our own legitimate interests or those of third parties provided these are not overridden by your interests and fundamental rights and freedoms. A description of our legitimate interests is set out below.

Where necessary, processing based on your consent. Where we process special categories of Personal Data about you, this will be with your explicit consent.

Purposes of Processing

1. to help us identify you
2. to provide the goods and/or services purchased by you and provide any related services or follow-up service or information as required
3. to process your payment(s) to us

1. to send marketing information and surveys to you by email, post and text
2. to keep you updated on services which may be of interest or relevance to you

1. to make adjustments to the way we serve you, provide deliveries and deal with concerns or enquiries which involve special categories of Personal Data about you, at your request and with your consent.

Personal Data

- Details of current and past purchases and orders made by you
- Gender
- Personal Data contained in any other communication you make with us
- Your communication and marketing preferences
- Your interests, preferences, feedback and survey responses
- Your location
- Details of products you have expressed an interest in
- Your online browsing activities on our websites
- Accident/Incident/Near Miss reporting and investigation data

Basis of Processing

Processing that is necessary for our own legitimate interests or those of third parties provided these are not overridden by your interests and fundamental rights and freedoms. A description of our legitimate interests is set out below.

Processing that is necessary to comply with a legal obligation to which we as the controller are subject.

Purposes of Processing

1. to respond to and/or deal with requests, enquiries or complaints
2. for managing our charity
3. for marketing purposes
4. to follow up with you by telephone
5. for the prevention and detection of crime
6. for statistical purposes
7. for improving and changing our services and processes
8. for the processing of any insurance or other claim by any employee or third party.
9. for legal compliance