



## Data Protection Policy

### **A. Who we are**

1. Always Look on the Bright Side Of Life Charitable Trust (“the Charity”) is a registered charity. We can be contacted at: [brightsidecharity@hotmail.com](mailto:brightsidecharity@hotmail.com). Our website is: <http://www.thebrightsideoflife.org.uk/>.

### **B. The Charity’s purposes for processing data**

2. Always Look on the Bright Side of Life Charitable Trust processes personal data, including sensitive personal data, in a way that is lawful, necessary, proportionate, and fair.
3. It is necessary for the Charity to process personal data so that applications for grants can be submitted to us, we can consider applications, and beneficiaries can receive grants from the Charity. It is also necessary for our accounting and reporting and to ensure that our charitable funds are used for charitable purposes.
4. The Charity processes personal data about individual applicants,<sup>1</sup> for the purposes of considering and determining applications for a grant, and accounting and reporting.
5. We maintain a record of all applicants who have received grants from the Charity in the past so that:
  - a. we can consider any future applications received by applicants in the context of a past grant. This is so as to ensure that we are using our funds in the best possible way to achieve our charitable purposes, which may mean deciding not to award multiple grants to a beneficiary;

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<sup>1</sup> “Applicants” in this policy includes the potential beneficiaries and the applicant who submits the application on their behalf.

- b. we can review the grants we have awarded in the past so as to consider the achievement of our charitable objectives and the purposes and types of grants the Charity has awarded; and
  - c. for our accounting and reporting purposes.
6. Most of the data we process and store is by consent. We also process and store data for applicants' legitimate interests and the Charity's legitimate interests.
  7. An application submitted to our charity for a grant includes a 'checkbox' giving consent to the processing of that data by the Charity. The purposes of processing data by the Charity is specific, as set out in this policy. To ensure that consent is informed, we will provide a copy of this data policy on the Charity website.
  8. Consent can be withdrawn by contacting us at: [brightsidecharity@hotmail.com](mailto:brightsidecharity@hotmail.com) with details of your withdrawal of consent and including the subject 'DATA PROTECTION – CONSENT WITHDRAWN'. We may nevertheless need to continue processing the data for our legitimate interests; but we will review whether this is proportionate when any request is received.
  9. We accept grants from third parties on a data subject's behalf, which we process on the basis of the applicant's legitimate interests. For example, we accept applications on behalf of a child by a parent or professional, such as a social worker, teacher, or support worker, on the basis that such applications are in the child's legitimate interests of potentially receiving a grant.

### **C. Fundraising**

10. We accept donations on an anonymous basis. We do not keep a record of individual donors' personal data. This is not necessary at present for our charity's purposes; if this changes in future this policy will be reviewed.

### **D. Third Parties**

11. We will never sell personal data that we hold to any third parties.
12. We will not pass on personal data that we hold to any third parties unless we have the applicant's express written consent to do so, or where it is required by law. As our

beneficiaries are children, we may receive consent on the child's behalf from their parent or legal guardian.

13. It may sometimes be necessary for us to pass on personal data about a data subject in order to process an application; we will ensure we have consent before doing so. Such consent may include written consent in the application form for another individual or organisation to be contacted in relation to the applicant, or an email.
14. The following are some example situations where personal data may be shared by the Charity with third parties:
  - a. we may need to pass on an applicant's name and address to allow delivery of a product that is being provided to a beneficiary as a grant;
  - b. we may need to contact a professional, organisation, or charity about the application. We will only do this if we have consent from the applicant in the application form or separate express written consent to make that contact, such as in an email to the Charity;
  - c. we may need to pass on personal data to a provider of an activity that forms the basis of the grant. For example, if an application is made for funding towards a school trip, we will need to make payment to the school or provider directly and therefore give sufficient details to that school or provider to identify the beneficiary of the grant.

## **E. Data Storage**

15. We only collect and store personal data for the specific purposes set out above.
16. We keep personal data secure by the following processes:
  - a. Applications are submitted by email to [brightsidecharity@hotmail.com](mailto:brightsidecharity@hotmail.com). We encourage applicants to use encrypted email;
  - b. Applications are received to a password-protected email account;
  - c. Unsuccessful applications are deleted within six months of a decision being made by the Charity;

- d. Relevant personal data from successful applications is stored in a password-protected database; and
  - e. Any no longer relevant data from successful applications is deleted within six months of a grant being awarded.
17. We only keep relevant personal data. The following is stored for all successful applicants who receive a grant from the Charity for at least six years following the award of a grant:
- a. Full name of applicant and beneficiary;
  - b. Date of birth and age of beneficiary;
  - c. Address of applicant and/or beneficiary;
  - d. Telephone number of applicant and/or beneficiary;
  - e. Email address of applicant and/or beneficiary;
  - f. Summary of supporting documentation provided with application;
  - g. Purpose of grant;
  - h. Category of disadvantage;
  - i. Date of application;
  - j. Date of grant;
  - k. Amount requested;
  - l. Amount awarded;
  - m. The form of grant awarded, including when payment/order was made;
  - n. Email correspondence between the Charity and the applicant; and
  - o. We may also store supporting documentation.
18. This data of successful applicants is stored for at least six years.
19. Applications that are unsuccessful will be deleted within six months of a decision being made by the Charity.

20. Data subjects may see the information we hold about them on request, as required by law.

#### **F. The right to have personal data erased**

21. The Charity will consider applications for deletion of personal data when such a request is received from the data subject, their parent or legal guardian if a child, or the original applicant if this is someone else, such as a supporting professional; for example, a support worker, social worker, or teacher.

#### **G. Data breaches**

22. In the case of any data breach, we will comply with the notification requirements as required by law.

#### **H. Complaints**

23. If you have a complaint about our processing of your data please email us at [brightsidecharity@hotmail.com](mailto:brightsidecharity@hotmail.com) marking clear in the subject line 'DATA PROTECTION – COMPLAINT'. You can also complain to the ICO at: <https://ico.org.uk/make-a-complaint/>

**Michael Daly & Gemma Daly**

**Always Look on the Bright Side of Life Charitable Trust Trustees**

**25 May 2019**

**ed. 29 April 2021**