

## Privacy and Cookie Policy

Freedom Trust is a charity registered in England. Registered charity no 1039290. Registered office: Freedom Centre, 1 Howard Avenue, Barnstaple, EX32 8QA, UK.

This Privacy and Cookies Policy, together with our Terms and Conditions, defines the parameters which we use to store, process or collect any personal information we ask for or that you provide to us. Please read this policy carefully to understand our obligations and practices regarding your personal information and how we will handle it.

Through visiting and browsing [www.freedomtrust.org.uk](http://www.freedomtrust.org.uk) and any associated subsites you consent to the practices outlined in this policy and the criteria detailed in our Terms and Conditions.

For the intention of The General Data Protection Regulation (GDPR) (EU), the data controller is Nigel Harris. Any queries regarding this policy should be directed to our representative located at: Freedom Centre, 1 Howard Avenue, Barnstaple, EX32 8QA or emailed to: [admin@freedomtrust.org.uk](mailto:admin@freedomtrust.org.uk) or by telephone: 01271 321171.

### Information we may collect about you

We may gather and process the following information about you:

**Information you provide:** On occasion, you may provide information about you when completing forms, making purchases or giving donations through our website, appeals, or by corresponding via mail, email, over the phone, or via facsimile. This includes, but is not limited to, information you provide when you complete registration forms to use our website, subscribe to our newsletter or other notifications, make donations to our appeals or appeals from other fundraisers on our website, set up regular donations, give one-off donations, and when you report a problem with our website. It also includes, but is not limited to, information provided when filling out order forms, completing purchases from our online shop, and details included in legacy and in memorandum documentation. Information provided might include, but is not limited to, your name, age, address, and email address, phone number, financial and credit card details;

**Information we collect:** We may automatically collect from you in regard to your visits to our website the following information:

**Technical information:** including, but not limited to, Internet Protocol address ('IP' address) which is used to connect your device to the internet, your login information, browser type and version, time zone settings, browser plug-in types and version, operating system and platform;

**Information about your visit:** including, but not limited to, the full Uniform Resource Locators ('URL') used to navigate to and from our website, pages, products and resources viewed or searched for, our page response times, download errors, length of time spent on pages visited, interaction information (e.g.: scrolling, clicks, swipes and mouse-overs), the methods used to browse away from a page, and any phone number used to contact us.

**Information received from other sources:** We sometimes receive information about you if you use any of our subsites, social media accounts, or other services we provide. We work closely with third-party organisations (e.g.: business partners, sub-contractors, payment and delivery services, advertising networks, analytical providers, search information providers and others) and these sources may provide us with information about you.

## Other Sources:

We may gather your personal information when you subscribe to any service we provide.

We may gather your personal information when you apply for a job or volunteer position with us to process your application and to monitor our recruitment processes and statistics.

## Cookies

Our website uses cookies to discern you from other website users. This aids us in delivering a good website experience when you browse our content and enables us to improve our website.

By using our website and agreeing to our Terms and Conditions and Privacy and Cookies Policy you agree to our use of cookies in compliance with the terms set out in this policy.

A cookie is a small file containing an alphanumeric identifier that is sent by a web server to a web browser and is stored by the browser. The alphanumeric identifier is then sent back to the server each time the browser requests a new page from the server.

Cookies can be either a 'persistent cookie' – stored by a web browser and remaining valid until its set expiry date (unless deleted by the user before the expiry date), or a 'session cookie' which expires at the end of the user session when the browser is closed.

Typically, cookies do not contain any information that identifies a person, however, personal information stored about you by us may be linked to the information stored in and obtained from cookies.

Cookies can and are used by web servers to identify and track users as they browse different pages on a website and to identify returning website users.

We use both persistent and session cookies on our website.

The cookies we use recognise a device when a user visits our website, to track users as they navigate our website, to enable to use of a shopping cart on our website, to improve the usability of our website, to administer our website, to prevent fraud and improve our website security, to validate authenticated users sessions, and to facilitate the use of our website's search engine.

Our website uses third-party cookies. Details of these third party cookies are detailed below:

Most browsers allow you to refuse to accept cookies; however, blocking all cookies will have a negative impact on the usability of our website and many other websites.

If you block cookies, you may not be able to use the features and functions on our website.

It is possible to delete the cookies stored on your computer. Deleting cookies can have a negative impact on the usability of our website and many other websites.

## How we use your information

The information we hold about you is used in the following ways:

**Information you give to us:** information is used to complete our obligations in connection with any contracts, charitable services, charitable giving elected to enter into by you between you and us, and to supply you with the data, services and products that you request. This includes, but is not limited to, processing donations to the relevant project within our charity and providing refunds as per our refunds policy;

#### *For fundraising purposes:*

To deliver information about products or services we offer that are similar to those you have made queries about or purchased in the past, or to deliver information about Freedom Trust and our appeals and campaigns;

#### *For administrative purposes;*

For internal record keeping, to manage feedback, and to respond and process complaints;

To deliver information about Freedom Trust and the ways in which you can support our work. This can include, but is not limited to, postal and email correspondence, messages delivered through social media such as our Facebook and Twitter accounts, or through online advertising. If you do not wish for us to use your information in this way please contact us to advise of your preferences by telephone on 01271 321171, by email at [info@freedomtrust.org.uk](mailto:info@freedomtrust.org.uk) or by mail at 1 Howard Avenue, Barnstaple, EX32 8QA;

To advise you of changes to our services; and

To enable us to ensure our website's content is delivered in the most effective and efficient way for you and your device.

#### Information we collect about you:

Information we collect about you is used in the following ways:

##### *To administer our website*

For internal processes including but not limited to, troubleshooting, data analysis, customer and donor profiling and matching, testing, research, page and message optimization, statistical and survey purposes;

To improve our site and ensure our content is delivered in the most effective and efficient way for you and your device;

To aid your participation in the interactive features of our website, services, appeals and campaigns when you choose to do so;

To help us keep our website secure and safe;

To measure and analyse the effectiveness of the advertising delivered to you and others, and to deliver relevant advertising to you; and,

To suggest and recommend products and services for you and other website users that we believe may be of interest to you or them.

#### Information from other sources

The information you provide and the information we collect about you may be combined. We may use the combined information for the purposes detailed above.

#### Our promise to you

Every person who engages with us is a blessing to us and we value each and every contribution you make. We will never sell or share your personal data with third parties for marketing purposes or for purposes other than as described in this Privacy and Cookies Policy.

#### Sharing your information with others

We may from time to time, share your information with selected third party partners, including:

Business partners, sub-contractors and suppliers for the conduct of the contracts that we enter into with them or you or for the fulfilment of any order placed by you or donation given by you;

Advertisers and advertiser networks which require the information to select and send appropriate advertising about Freedom Trust to you and others. We may use such combined data to aid advertisers in their analysis of our advertising and to reach our target audiences (for example, residents of the South West of England). We may make use of personal information we have collected to enable us to display our advertising to these target audiences; and

Analytical information and search engine providers that support us to improve and optimise our website.

We may also share your information with third parties:

If we are subject to a duty to disclose or share your personal information in order to adhere to legal obligations, or in order to apply our Terms and Conditions and other agreements; or to protect the property, safety or rights of Freedom Trust, or others such as the police, regulatory bodies; and,

In some cases, we may be obligated to disclose information or undertake more detailed monitoring under the Regulation of Investigatory Powers Act 2000 or Freedom of Information Act 2000 as amended.

### Storage of your personal information

The information that we collect from you is processed by staff who may be engaged in, among other things, the processing of your payment details. By submitting your personal data, you agree to the transfer, storing and processing of your information. Freedom Trust takes all reasonably necessary steps to ensure that your data is treated securely and in accordance with the General Data Protection Regulation (GDPR) (EU) and this Privacy and Cookies Policy.

All data provided to us by you is stored on secure servers. Any donation transactions are carried out on secure sites. Where password access enables you to admittance to certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transfer of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site; any transaction is at your own risk. Once we have received your data, we use strict procedures and appropriate security controls with the intent of preventing unauthorised access.

Any credit card details we receive through our website are passed securely to our partners who are compliant with Payment Card Industry Security Standards to fulfil and process donations.

### Your rights

You have the right to ask us not to process your personal information for marketing Freedom Trust and our literature. We will always inform you at the time we collect your information if we intend to use your information for such purposes. You may exercise your right to prevent such processing by contacting us on 01271 321171 or writing to us at: 1 Howard Avenue, Barnstaple, EX32 8QA, or via email at: [info@freedomtrust.org.uk](mailto:info@freedomtrust.org.uk)

Our site may, from time to time, contain links to and from partner websites and their affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy and

cookies policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### [Access to your information](#)

The General Data Protection Regulation (GDPR) (EU) gives you the right to access the information held about you. Your right of access can be exercised in accordance with this regulation. Any access request is free of charge.

#### [Changes to our Privacy and Cookies Policy](#)

Any changes we may make to our Privacy and Cookies Policy in the future will be made on this page. Please check back frequently to see any updates or changes to our Privacy and Cookies Policy.

Privacy Policy updated 01 June 2018.

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