

SATRO PRIVACY POLICY

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

We'll keep this page/document updated to show you all the things we do with your personal data. This policy applies if you're a supporter of SATRO (donor, funder, volunteer, customer, contractor or employee) or use any of our services, visit our website, email, call or write to us. In certain circumstances we may also provide an extra privacy notice, which will always refer to this page/document.

We'll never sell your personal data and will only share it with organisations we work with when it's necessary and the privacy and security of your data is assured.

Who are 'we'?

In this policy, whenever you see the words 'we', 'us', 'our', 'SATRO', it refers Surrey SATRO. We are an educational charity (our Registered Charity number is 1040572).

Surrey SATRO delivers a range of programmes designed to inspire young people with regards to STEM (Science, Technology, Engineering and Math's) learning and associated careers.

If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to contactus@satro.org.uk or addressed to the Data Protection Officer, SATRO, Unit 23, Surrey Technology Centre. 40 Occam Road, Surrey Research Park, Guildford, GU2 7YG.

What personal data do we collect?

Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address) will be collected and used by us. We'll only collect the personal data that we need.

We collect personal data in connection with specific activities such as booking an event or programme, event or programme participation or attendance, donations, funding, volunteering, conducting research, employment etc.

You can give us your personal data by filling in forms on our website, contacting us via social media, or by corresponding with us (by phone, email or letter).

This personal data you give us may include name, title, address, date of birth, age, gender, employment status, demographic information, email address, telephone numbers, personal description, photographs, attitudes, opinions, usernames and passwords.

Personal data provided by you

This includes information you give when interacting with us, for example booking an event, registering to be a volunteer or communicating with us. For example:

- Personal details (name, date of birth, email, address, telephone, and so on) when you join as a supporter
- Financial information (payment information such as credit or debit card or direct debit details and whether donations are gift-aided)

- Your opinions and attitudes about SATRO activities and your experiences of them

If you are the teacher or parent of one of our junior supporters, your details will be recorded and your association with that relationship will be recorded.

Personal data created by your involvement with us

Your activities and involvement with us will result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our programmes and activities. If you decide to donate or fund us then we'll keep records of when and how much you give to a particular cause.

Information we generate

Occasionally, we conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we may be able to build a profile which helps us decide which of our programmes and/or communications are likely to interest you.

Information from third parties

We access external data readily available in the public domain (e.g. government websites) and combine it with your personal data at an aggregated level to ensure our data is kept up to date.

Sensitive personal data

At times we'll collect sensitive personal data for Equal Opportunities monitoring, as well as researching whether we deliver great experiences for everyone, but this is only ever analysed at an aggregate level.

Volunteer

If you're a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

Children's personal data

Marketing to young people

We won't send marketing emails, letters or make calls to people under the age of 13. We will not send any marketing communications requesting donations or payments to young people aged between 13 and 17 and won't profile anyone under the age of 18.

All communications to young people aged between 13 and 17 and use of their data will be conducted with parental and/or school consent and in accordance with any activity terms and conditions, forwarded prior to commencement.

Membership of our SATROClub and receipt of associated communications, by young people aged 13 and above, will be a result of their registration/written request (email or form) to join.

How we use your personal data

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

Personal data provided to us will be used for the purpose or purposes outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data.

Your personal data may be collected and used to help us deliver our charitable activities, help us raise funds, or complete your request. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our various services, website and activities.

Marketing communications

Your privacy is important to us, so we'll always keep your details secure. We'd like to use your details to keep in touch about things that may matter to you.

If you choose to hear from us we may send you information based on what is most relevant to you or things you've told us you like. We may also show you relevant content online. This might be about volunteering with us, events, fundraising, or sharing good news.

We'll only send these to you if you agree to receive them and we will never share your information with companies outside SATRO for inclusion in their marketing. If you agree to receive such marketing information from us you can change your mind at a later date.

However, if you tell us you don't want to receive such marketing communications, then you may not hear about events or other work we do that may be of interest to you.

We may sometimes use third parties to capture some of our data on our behalf, but only where we are confident that the third party will treat your data securely, in accordance with our terms and in line with the requirements set out in the GDPR (General Data Protection Regulation). [How can I change my contact preferences?](#)

We'd love to stay in touch, but we don't want to out-stay our welcome. Choose how you would like us to get in touch with you by following this [link](#).

We'll always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a volunteer, donor/funder or buyer/user of our services. Examples are:

- Transaction messaging, such as purchase/booking confirmations
- Supporter related mailings such as relevant newsletters, notice of applicable events and end of grant reports

Fundraising, donations and legacy pledges

Where we have your permission, we may invite you to support our valuable work by making a donation, getting involved in fundraising activities or leaving a gift in your will.

Occasionally, we may invite some supporters to attend special events to find out more about the ways in which donations and gifts in wills can make a difference to specific projects and to our cause. We'll also send you updates on the impact that you make by supporting us in this way, unless you tell us not to.

If you make a donation, we'll use any personal information you give us to record the nature and amount of your gift, claim gift aid where you've told us you're eligible and thank you for your gift. If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts.

If you've told us that you're planning to, or thinking about, leaving us a gift in your will, we'll use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this.

If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we'll note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you wanted.

Charity Commission rules require us to be assured of the provenance of funds and any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors who've made, or are likely to make, a significant donation to SATRO.

As part of this process we'll carry out research using publicly available information and professional resources. If this applies to you, we'll remind you about the process when you make your donation.

Management of volunteers

We need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include: contacting you about volunteering opportunities or activities we think you might be interested in, and to recognise your contribution.

It could also include information from us about things happening where you volunteer and about your volunteering, including asking for your opinions on your volunteering experience.

We may also share this with funders to help them monitor how their funding is making a difference.

Programme/event booking and management

We process customer data in order to fulfil programme/event bookings and associated regular activities. Your data will be used to communicate with you throughout the process, including to confirm the event, to clarify where we might need more detail to fulfil a booking. We may also hold dietary requirements and mobility/access needs for events.

Research

We carry out research with our supporters, customers, staff and volunteers to get feedback on their experience with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.

If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity). You don't have to provide this data and where applicable we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring).

We may give some of your personal data (e.g. contact information) to a research agency who will carry out research on our behalf.

Profiling

We know it's important to our supporters to use our resources in a responsible and cost-effective way. So we use semi-automated profiling and targeting to help us understand our supporters and make sure that:

- our communications (e.g. emails) and services are relevant, personalised and interesting to you
- our services meet the needs of our supporters
- we only ask for further support and help from you if it's appropriate
- we use our resources responsibly and keep our costs down

To do this we'll analyse how you interact with us (e.g. funder, volunteer) and if applicable use both geographic and demographic information to let you know what's happening in your local area and understand your interests/skills.

If you've agreed that we can contact you for marketing purposes, we may also gather additional information about you from external sources, for example: updates to address and contact information, or publicly available information regarding your wealth and employment at an aggregate level. We may use this information to assess your capacity to support us and invite you to do so.

Recruitment and employment

In order to comply with our contractual, statutory, and management obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees.

Such data can include, but isn't limited to, information relating to health, racial or ethnic origin, and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it's processed is given below.

Contractual responsibilities: Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay; leave, maternity pay, pension and emergency contacts.

Statutory responsibilities: Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

Management responsibilities: Our management responsibilities are those necessary for the organisational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, absence, disciplinary matters, e-mail address and telephone number.

Sensitive personal data

The Act defines 'sensitive personal data' as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

In certain limited circumstances, we may legally collect and process sensitive personal data without requiring the explicit consent of an employee. As such data is likely to be of a private nature, we commit to treating this data with greater care.

(a) We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

(b) We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

(c) Data about an employee's criminal convictions will be held as necessary.

Disclosure of personal data to other bodies

In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs.

In order to fulfil our statutory responsibilities, we're required to give some of an employee's personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

Updating your data and marketing preferences

We want you to remain in control of your personal data. If, at any time, you want to update or amend your personal data or marketing preferences please contact us in one of the following ways:

Email us

Email: contactus@satro.org.uk with your full name, full address and details of your request.

Call us:

01483 688070. Open 9.00am - 5.00pm weekdays.

Write to:

SATRO, Unit 23, Surrey Technology Centre. 40 Occam Road, Surrey Research Park, Guildford, GU2 7YG.

Verification, updating or amendment of personal data will take place within 30 days of receipt of your request.

Your data protection rights

Where SATRO is using your personal data on the basis of consent, you have the right to withdraw that consent at any time. You also have the right to ask us to stop using your personal data for direct marketing purposes.

Tell us using the details above.

Subject access rights

If you would like further information on your rights or wish to exercise them, please write to us at The Data Protection Officer, SATRO, Unit 23, Surrey Technology Centre. 40 Occam Road, Surrey Research Park, Guildford, GU2 7YG.

You will be asked to provide the following details:

- The personal information you want to access;
- Where it is likely to be held;
- The date range of the information you wish to access

We will also need you to provide information that will help us confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

Once we have all the information necessary to respond to your request we'll provide your information to you within one month. This timeframe may be extended by up to two months if your request is particularly complex.

What to do if you're not happy

In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO) if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at www.ico.org.uk.

Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, supporters and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we don't accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This privacy policy applies solely to the personal data collected by SATRO.

Keeping your information

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

How we secure your data

Information system and data security is imperative to us to ensure that we are keeping our customers, donors/funders, volunteers, employees and Associates safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape. In addition to this, our data is hosted in secure UK data centres that are certified to the ISO 27001 standard for information security.

Our staff and key Associates are provided information security and data protection training to reinforce responsibilities and requirements set out in our associated policies and procedures.

Disclosing and sharing information

In order to carry out our contractual responsibilities with funding bodies, we may, from time to time, need to share personal data with one or more third party supplier. This data is only shared with your prior consent and with third parties who can demonstrate their compliance with the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

When we allow third parties acting on behalf of SATRO to access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal information for other organisations to use.

Personal data collected and processed by us may be shared with the following groups where necessary:

- SATRO employees, associates and volunteers
- Researchers who conduct market research on our behalf;
- Third party cloud hosting and IT infrastructure providers who host the website and provide IT support in respect of the website;

Also, under strictly controlled conditions:

- Contractors
- Service Providers providing services to us
- Advisors
- Agents

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of SATRO, our employees, supporters and customers. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Storage of information

SATRO operations are based in the UK and we store most of our data within the UK. Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our systems are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-

based solutions, it may be that using their products results in data transfer to the USA. However we only allow this when the service provider is certified on US Privacy Shield and that they meet our baseline requirements for information security.

Changes to this privacy policy

We'll amend this privacy policy from time to time to ensure it remains up to date and reflects how and why we use your personal data and new legal requirements. Please visit our website to keep up to date with any changes. The current version will always be posted on our website.

This privacy policy was last updated on 11 May 2018.