

The Goodwood Education Trust
(Registered charity 1198212 as The West Sussex Countryside Studies Trust)

PRIVACY NOTICE

This notice describes the Goodwood Education Trust's privacy policy. Please read it in order to understand what we do with your information. The purpose of this privacy notice is to give you information on how we collect and process your personal data. It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Who we are

The Goodwood Education Trust is the working name for The West Sussex Countryside Education Trust (charity number 1198212). The Goodwood Education Trust is registered with the ICO under number ZB456320.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

How to contact us

The Goodwood Education Trust, Home Farm, Goodwood, Chichester, West Sussex, PO18 0QF. Telephone number: 01243 755157. Email address: get@goodwood.com

The data we collect about you

All personal information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this privacy notice.

The type of data we collect about you:

- **Identity data** includes first name, last name, date of birth.
- **Contact data** includes address, email address and telephone numbers.
- **Financial data** includes bank account and payment card details.
- **Special categories of data** includes data about your health and dietary requirements.
- **Marketing and communications data** includes your preferences in receiving marketing from us and your communication preferences

How your personal data is collected

The methods we use to collect data from and about you are detailed below:

Direct interactions:

You may give us your data by filling in forms, by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- book an activity or experience with us;
- attend one of our activities or experiences;
- request marketing to be sent to you

How we use your personal data

We have set out below a description of all the ways we plan to use your personal data and which of the reasons we rely on to do so.

Purpose/activity	Type of data	Lawful basis for processing including legitimate interest
To process, manage and fulfil your booking	Identity Contact Financial Special category	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records up to date, to study how customers use our products/services)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our charitable activities)

Legitimate Interest means the interest of our charity in conducting and managing our charity to enable us to give you the services and products. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Marketing

We will always provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity and Contact data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service experience.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Disclosures of your personal data

We will only share your information in the circumstances below:

- **Third party service providers:** Where we engage other companies to perform functions on our behalf and fulfil our obligations. They have access to personal information needed to perform their functions but may not use it for any other purpose. Further, they must process the personal information in accordance with this privacy notice and as permitted by applicable data protection laws.
- **For the protection of us and third parties:** We release personal information when we believe release is appropriate to comply with the law. This does not include sharing or otherwise disclosing personally identifiable information in a way that is contrary to the commitments made in this privacy notice.
- **With your consent:** other than as set out above, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share the information.

International transfers

We will not transfer your personal data to another country.

Data security

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a data breach where we are legally required to do so.

You have the right to ask us to provide you with all the information we store on you and to ask us to rectify, block, complete and delete your personal data, to restrict its use, and to port your data to another organisation. You also have the right to object to the processing of your data by us in some circumstances and, where we have asked for consent to process your data, to withdraw this consent.

There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information. In addition, we may be able to retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

Request access to your personal data (a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

If you wish to exercise any of the rights above, please contact the Goodwood Education Trust Manager on 01243 755157 or by email at get@goodwood.com.