



Salamander Trust
ON THE RIGHT(S) TRACK

Salamander Trust

Privacy Notice

Policy to be reviewed annually

Review: Alice Welbourn May 2018

Approved by Trustees May 2018

For publication on the Salamander Trust website

1. WHO WE ARE

Salamander Trust is a registered UK charity (no. 1143381) and a company limited by guarantee (06734362). We take our responsibilities regarding your data very seriously. We are thus committed to processing your personal data in accordance with the UK law. The Salamander Trust Privacy Notice is available on our website, www.salamandertrust.net, and applies to any person whose personal data we may process. The purpose of this Notice, is to explain in more detail how we store, manage and protect your personal information.

If you have any questions about this Privacy Notice or on how we use your personal data please contact us at [alice @ salamandertrust dot net](mailto:alice@salamandertrust.net).

2. WHY WE PROCESS PERSONAL DATA ABOUT YOU

In order to carry out its day to day operations and duties, Salamander Trust processes a wide range of personal data. The legal basis for this is outlined in our Privacy Notice. This section explains why we process personal data.

The Salamander Trust supports the advancement of our work through the creation of meaningful relationships with partners, colleagues and others working on similar issues, both in the UK and globally. We do this by sharing relevant information, publications, and

events, all either created by ourselves or other partners. We are very proud of the relationships we have with all our partners and colleagues and we use your personal information to ensure we contact you in the most appropriate way, to improve our offering and to ensure we work efficiently and effectively.

In many cases, we are processing your personal information because you have asked us to keep you in touch about our activities. Sometimes we also ask you for specific consent, for example to check that you want to receive information from us by email, by WhatsApp and/or by other electronic or postal means.

We also guarantee that use of your personal data is in accordance with the Salamander Trust's legitimate interests. Specifically, we expect the following to fall within our legitimate interests:

- promoting the charitable objects and interests of the Salamander Trust.
- Holding relevant project-related and other networking events
- keeping the *Stepping Stones* International Community of Practice up to date about our activities and related information through our mailchimp newsletter
- fostering long-term relationships with our partners, colleagues and others, to support our development and objectives
- keeping a record of our partners and colleagues for historical or research purposes
- ensuring that we comply with any statutory obligations, including safeguarding and promoting the welfare of any children with whom we or you may come into contact through use of our materials
- ensuring we meet our obligations around financial record keeping, including for the purposes of Gift Aid.

3. TYPES OF PERSONAL DATA WE PROCESS AND HOW THEY ARE OBTAINED

Salamander Trust holds separate databases for each of its relevant projects. Our database contains personal information collected by Salamander Trust during the course of our relationship with colleagues, partners and relevant others.

Currently our databases include, but may not be limited to, such lists as the following:

- The *Stepping Stones* International Community of Practice (mailchimp database)
- The 4M UK WhatsApp group and email list
- The 4M+ Kenya WhatsApp group and email list
- Databases of attendees at past Salamander Trust events (for use for future events)
- Databases of trained *Stepping Stones with Children* facilitators across East and Southern Africa
- Databases of trained *Stepping Stones* trainers across East and Southern Africa
- Database of requests for free copies of *Stepping Stones with Children*
- Lists of partners involved in specific research, advocacy and/or training projects

Information we hold may include some or all of the following: your name(s), your gender, your age, your work and/or personal email, your personal and/or work telephone no., the

organisation(s) you work with (if relevant), your work title, the country you live in, your postal address, your occupation, health status and professional interests.

Most of the information we hold is obtained directly from you, for example information that you provide on entry to the *Stepping Stones* website, or on joining a WhatsApp group. When a partner leaves an organisation, they can provide their personal or new organisation contact details, if they wish, by contacting us on the email address below. We also collect personal data from you when you participate in events and activities or kindly donate to the Salamander Trust.

We do not use third-party companies to research or profile but we may analyse publicly available information about potential donors to contact you about initiatives and events that may interest you, or to make appropriate requests. This includes information on professional social media networks such as LinkedIn.

As a charity, we may have to carry out due diligence regarding any generous donations which you make to the Salamander Trust. This may involve obtaining and recording your personal information from sources such as 192.com, LinkedIn, the Charity Commission, and related media articles.

4. ACCESS TO PERSONAL DATA AND WHOM WE SHARE IT WITH

For the most part personal data collected by us will remain within the Salamander Trust and will only be shared with other associates in the Trust for specific purposes (eg to organise a networking event or to ask a former contact if they wish to speak at a Salamander Trust event). All our associates have signed a confidentiality clause as a part of their contract to work with us.

We may have to share personal data with government authorities such as HMRC and if you interact with us through a third party (for example if you support the Trust via the Charities Aid Foundation Donate giving platform).

We also share your data with Practical Action Publishing (PAP) if you have in any way expressed interest in our *Stepping Stones* training programs. This is so that PAP may contact you with information about these or other relevant materials from time to time. You can always opt out of their database directly through them if they contact you, if you prefer.

None of our processing activity is currently carried out on our behalf by third parties such as database providers, web developers and event booking platforms. In the highly unlikely event that this were to occur in future, this would be subject to contractual assurances that personal data will be kept securely and only in accordance with the Salamander Trust's agreement and/or specific direction. We would never sell your data to a third party.

5. HOW LONG WE KEEP PERSONAL DATA

The Salamander Trust will retain your personal data for the duration of our operation as a charity, unless you ask us to remove your information. In the case of data acquired

specifically for research purposes, these data will be kept for the duration and in the confidential manner required by the academic institution concerned. This may be for longer than the existence of the charity.

The Trust will keep information about you as long as we have a legitimate or legal reason to do so. We will always try to ensure that the information we hold about you is up to date, reasonable and relevant.

We retain details of our partners, colleagues and others as described above indefinitely so that we can communicate with you as part of our international community. You may change your contact preferences at any time (see Your Rights below). We may also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in future.

6. YOUR RIGHTS

Please also refer to other parts of this Salamander Trust Privacy Notice for more information on the individual's rights under Data Protection Law.

You can tell us at any time that you do not wish to receive fundraising or other information promoting our activities and events. You can also change your communication preferences by contacting us or by following the online link in the communications we send to you.

Consent: you have the right to withdraw consent where given. Please be aware that we may not be relying on consent to process your data but may have another lawful reason to process the personal data in question even without your consent. (For example, this might apply if we are ordered by legal authorities to provide them with information about you in relation to child protection issues.)

Access: you have the right to access and understand personal data held about you, and in some cases ask for it to be erased or amended or have it transferred to others, or for the Salamander Trust to stop processing it – but subject to certain exemptions and limitations. If you wish to access or transfer data to another person or organisation, or you have another objection to how your personal data is used, you should put your request in writing to the Founding Director (see contact details below).

The Salamander Trust will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The Salamander Trust will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the Salamander Trust may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

Accuracy: we will endeavour to keep information we hold about you up to date and as accurate as possible. You can ask us to erase or correct any out of date, irrelevant or inaccurate information we hold about you (subject to certain limitations and exemptions

under Data Protection Law). Please contact the Salamander Trust if you want to amend your personal information.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

7. THIS PRIVACY NOTICE

We will review and update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be provided to you directly as far as is reasonably practicable.

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should contact the Founding Director at the email address below. You can also make a referral or lodge a complaint with the Information Commissioner's Office (www.ico.org.uk), although the ICO recommends that steps are taken to resolve the matter with the organisation before involving the regulator.

8. CONTACT DETAILS

Salamander Trust
c/o Positively UK
345 City Road
London EC1V 1LR

Founding Director: [alice @ salamandertrust dot net](mailto:alice@salamandertrust.net)

Telephone: +44 203 289 7398

www.salamandertrust.net www.steppingstonesfeedback.org

Twitter: <https://twitter.com/SalamanderTrust> Twitter: <https://twitter.com/StStFeedback>

Facebook: <https://www.facebook.com/groups/SalamanderTrust/>