

# Local Trust Privacy Policy

## Introduction

Local Trust collects, processes and stores personal information (meaning information that relates to you from which you can be identified such as your name, address and other contact details) in accordance with its obligations under UK and EU data protection law.

This Policy outlines the personal data collection and processing practices related to Local Trust's websites [localtrust.org.uk](http://localtrust.org.uk) and [biglocalcommunity.org.uk](http://biglocalcommunity.org.uk) and their associated communications channels. It replaces the previous version of the policy which was published in May 2018.

This Policy does not cover all of the personal data processing operations by Local Trust, for example data processed in connection to staff and human resourcing, research projects and events, which are covered by internal policies and procedures.

The data controller for data collected and processed in accordance with this Policy is Local Trust (Information Commissioner's Office registration no. ZA003370). Local Trust is a charitable company limited by guarantee (Local Trust company no. 7833396, Local Trust charity no. 1147511).

Local Trust is the sole corporate trustee of Big Local Trust, a charitable trust registered in England and Wales (number 1145916) and runs the Big Local programme.

Local Trust's address is:

Local Trust  
CAN Mezzanine,  
7-14 Great Dover Street,  
London, SE1 4YR

Any questions regarding this Policy or any other data protection issue related to Local Trust should be submitted in writing to the above address or by email to [info@localtrust.org.uk](mailto:info@localtrust.org.uk).

## Guiding principles

Local Trust manages the development, funding and implementation of the Big Local programme and other programmes. It aims to enable residents to make their communities and areas even better places to live, by helping residents develop and use their skills and confidence to identify what matters most to them, and to take action to change things for the better. To meet these objectives, Local Trust needs to collect and process personal data, including data related to the use of [localtrust.org](http://localtrust.org) and [biglocalcommunity.org.uk](http://biglocalcommunity.org.uk). Local Trust is committed to the protection of personal privacy and ensuring that all of the personal data it collects and uses is processed in accordance with UK and EU data protection law.

In accordance with these principles, Local Trust limits the amount of data it collects to that which is needed to meet its objectives, and will only ever use the data that it collects for purposes that are related to these objectives. Local Trust will never sell the personal data it collects, and

makes every reasonable effort to protect the data under its control against unauthorised access and misuse.

Local Trust also engages third-party service providers and partners to help it meet its objectives. Local Trust makes every reasonable effort to use service providers who are equally committed to protecting personal privacy and comply with applicable data protection laws.

## Data collection and use

The personal data processed on [localtrust.org.uk](https://localtrust.org.uk) is limited to information about usage of our website (traffic data, including data derived from “cookies”) and the name and email addresses of people who sign-up to receive our newsletter. This data is used:

- to help us understand how people use localtrust.org.uk in order to improve our communication
- to send newsletters to our subscribers

We also process the data that you may input into [localtrust.org.uk](https://localtrust.org.uk) such as search queries or feedback on the website but this is not linked to any personal information and cannot therefore be used by Local Trust to identify users of the website.

The personal data processed on [www.biglocalcommunity.org.uk](https://www.biglocalcommunity.org.uk) includes the names, addresses phone numbers and email addresses of registered users of the platform, as well as any personal information included in requests for funding, spend reports and partnership and plan reviews, including the contact details of organisational representatives and their biographical profiles. This data is used:

- to implement the Big Local programme
- to manage relationships with applicants and those receiving Big Local funding
- to meet our legal and charitable obligations

Local Trust also uses social media platforms to link to and disseminate information about [localtrust.org.uk](https://localtrust.org.uk) and the Big Local programme. Local Trust social media accounts and pages are managed by Local Trust staff members. Local Trust does not import or export any information on its followers or subscribers from or to these platforms. Local Trust may however communicate through direct messaging over social media.

## Security of personal data

Local Trust takes all reasonable steps to ensure that personal data is held securely and in accordance with this Policy. Unfortunately, the transmission of information via the internet is not completely secure. Although Local Trust does its best to protect personal data, it cannot guarantee the security of personal data transmitted to any of its websites. Any such transmission is therefore at the website user’s own risk.

For personal data in its possession, Local Trust implements various technical and organisational measures in order to prevent unauthorised access. Wherever possible it encrypts the data it collects, transmits and stores. Access controls within the organisation limit the number of people who have access to personal information to those that need it in connection with their job responsibilities or contractual obligations.

## Local Trust partners and service providers

Local Trust works with a carefully chosen group of third party service providers to perform tasks on its behalf.

- Sky Toaster to host the [localtrust.org.uk](http://localtrust.org.uk) website
- Fluent Technology to host [biglocalcommunity.org.uk](http://biglocalcommunity.org.uk) website
- Campaign Monitor to provide Local Trust email services, manage our email lists and Community Wealth Fund alliance membership
- Facebook, Workplace, Twitter, YouTube and Flickr to reach users of those platforms
- Google analytics, Hotjar and Fluent Technology to provide statistical information about the use of the [localtrust.org.uk](http://localtrust.org.uk) and [biglocalcommunity.org.uk](http://biglocalcommunity.org.uk) websites

Local Trust only uses these service providers to perform the specific tasks listed above. However, these service providers may also use and retain personal data in accordance with their own policies, practices and legitimate interests.

While Local Trust has taken reasonable steps to ensure that these data processors comply with this policy and EU data protection law, users are advised to consult the privacy policies of these companies for further information about their practices. Users of social media platforms do so in accordance with the policies and terms of use of their operators.

Personal information uploaded to [www.biglocalcommunity.org.uk](http://www.biglocalcommunity.org.uk) may be shared with partner organisations who work with Local Trust to support the delivery of The Big Local and other programmes nationally. These partners include but are not limited to:

- The Directory for Social Change
- Small Change
- Other Big Local support partners (currently: Academy of Urbanism, Behavioural Insights Team, Media Trust, Shared Assets, Street Games, UnLtd, Campaign for Better Transport)
- Learning and Networking partners (currently: Sheila McKechnie)

Local Trust may also engage additional third-party service providers to provide services such as information technology support. These activities may involve the access to the personal data held by Local Trust. In these instances, Local Trust will take reasonable steps to ensure that any such data processing is carried out in accordance with this Policy. This includes conscientiously selecting service providers and only working with trusted partners.

## Cookies

Like most websites, [localtrust.org.uk](http://localtrust.org.uk) and [biglocalcommunity.org.uk](http://biglocalcommunity.org.uk) use “cookies” to administer content to their visitors. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).

## Disclosure

Local Trust may also disclose personal information to third parties in the following situations:

- If Local Trust or all of its assets are transferred to a successor body, in which case personal data under its control will also be transferred
- If Local Trust is required by law to share personal information with the police or other external agencies
- To protect the Local Trust, its partners or others against fraud or illegal activity

## Jurisdiction

The personal data processed by Local Trust via [localtrust.org.uk](http://localtrust.org.uk) is stored within the European Economic Area and processed in accordance with UK and EU data protection law.

The data that is processed by Local Trust via [biglocalcommunity.org.uk](http://biglocalcommunity.org.uk) is stored within the European Economic Area and processed in accordance with UK and EU data protection law. Fluent Technology, the host of biglocalcommunity.org, uses Amazon Web Services (AWS) as a customer service software. This data may be stored in the USA but can only be processed in accordance with EU data protection law pursuant to contractual clauses with AWS.

While Local Trust has taken reasonable steps to ensure that these data processors comply with this Policy and EU data protection law, users are advised that companies headquartered in the USA are subject to the jurisdiction of the country and, moreover, may transfer personal data outside of the European Union in accordance with their own policies, practices and legitimate interests.

## How long Local Trust keeps personal data

Local Trust retains personal data only for as long as necessary in accordance with the above purposes and applicable laws. When personal data is no longer necessary for these purposes it is securely deleted.

Personal information uploaded to [www.biglocalcommunity.org.uk](http://www.biglocalcommunity.org.uk) may be kept for longer periods in accordance with Local Trust's legal and charitable obligations, and in accordance with auditing requirements.

For consent-based services from which you can opt-out at any time such as email updates, Local Trust keeps personal data until it receives instructions to the contrary.

## Changes to this Policy

In the event that the Policy is changed at any time, the date and nature of the change will be clearly indicated in this document.

In the event that the change has a material impact on the handling of personal data, Local trust will contact the data subjects to inform of the changes and where appropriate seek their consent.

## Revisions

Last update: 9 May 2019