

The Kennel Club Charitable Trust GDPR Privacy Notice

1. Introduction

- 1.1. The Kennel Club Charitable Trust Trustees are committed to protecting the personal information and respecting the privacy of ambassadors, donors, grant applicants and the respective Trustees of the KCCT.
- 1.2. This Privacy Notice, together with any other documents referred to in it, sets out the basis on which any personal data will be processed.
- 1.3. The Kennel Club Charitable Trust was established by a Declaration of Trust dated 1 January 2005. For the purpose of the General Data Protection Regulation [Regulation (EU) 2016/679], the Data Controller is The Kennel Club Charitable Trust (charity number 327802), whose registered office is 10 Clarges Street, Piccadilly, London W1J 8AB.
- 1.4. This Privacy Notice may be updated from time to time. Please check back regularly to see any updates or changes to this Policy.

2. Data Protection Team

- 2.1. The contact details for our Data Protection Team are as follows:
 - 2.1.1. dataprotectionteam@thekennelclub.org.uk
 - 2.1.2. 01296 318 540
 - 2.1.3. The Kennel Club, 10 Clarges Street, London, W1J 8AB
- 2.2. It is the responsibility of the Data Protection Team to monitor compliance with Data Protection legislation, and to be the first point of contact for supervisory authorities and for individuals whose personal data is being processed.

3. Particulars of processing

- 3.1. The Particulars of Processing for the respective Kennel Club Charitable Trust Trustees, ambassadors, donors, and grant applicants are set out in the Schedules to this Privacy Notice.
- 3.2. It may be the case that you have contact in more than one capacity, so please read this notice and then look at all the relevant schedules that may apply to you if you wish to know more about how your personal data is processed including the purposes and legal basis.

The specific Schedules are as follows:

- 3.2.1. KCCT Trustees [Schedule 1];
 - 3.2.2. KCCT Ambassadors [Schedule 2];
 - 3.2.3. Donors to the KCCT [Schedule 3];
 - 3.2.4. KCCT Grant Applicants [Schedule 4].
- 3.3. Note – we will use personal data sometimes for statistical purposes but retain anonymity so you cannot be identified.

4. Your rights as a data subject

4.1. This Section sets out the rights of a data subject, as set out in the General Data Protection Regulation. Under certain circumstances by law you have rights of access, correction, erasure and restriction.

4.1.1 **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information held about you and to check that it is being lawfully processed.

4.1.2 **Request correction** of the personal information. This enables you to have any incomplete or inaccurate information corrected.

4.1.3 **Request erasure** of your personal information. To request deletion or removal of personal information where there is no good reason to continue to process the data.

4.1.4 **Object to processing** of your personal information 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. You also have the right to object to the processing of your personal information for direct marketing purposes.

4.1.5 **Request the restriction of processing** of your personal information. This enables you to ask that the processing of personal information be suspended, for example if you want us to establish its accuracy or the reason for processing it.

4.1.6 **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Team in writing.

4.2. The Kennel Club Charitable Trust will generally process personal data for contractual

necessity, legal obligation or its legitimate interests. The Kennel Club Charitable Trust will use personal information for additional relevant purposes you might reasonable expect, and where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. The law calls this the “Legitimate Interests” condition for processing. Where we rely on it the benefits being pursued are:

- 4.2.1 Complying with/supporting compliance with legal and regulatory requirements
- 4.2.2 Internal training purposes
- 4.2.3 To maintain records and other administrative purposes, including updating details and preferences

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

- 4.3. Where the processing of personal data is based on consent, there is a right as a data subject to withdraw that consent at any time.

If you wish to invoke this right, please notify our Data Protection Team using the contact details set out in Section 2 above.

- 4.4. You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

5. Recipients of Data

- 5.1. The Kennel Club Limited provides administrative services including data processing on behalf of the KCCT. Personal data is transferred to the Kennel Club Limited for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed. Personal data is only disclosed to third parties for a limited number of reasons, these include: charity administration, communications, data management, technical support, and processing payments.
- 5.2. The Kennel Club Limited has contracted with us as a Data Processor under the requirements in the GDPR. It is contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for the Kennel Club Limited will have access to personal data but only to the extent necessary to perform their services for us.
- 5.3. The Kennel Club Limited agrees to implement reasonable contractual and technical protections, to keep personal data confidential, not sell personal data to third parties and to not disclose personal data to third parties except as may be required by law, as permitted by the KCCT Trustees or as stated in this Privacy Policy.
- 5.4. In appropriate circumstances we may disclose data to authorised bodies as required by law.

6. Contact details

- 6.1. You can contact us at the Data Protection Team details above if you have any questions or concerns about personal data and privacy matters.

Schedule 1 – Kennel Club Charitable Trust Trustees

This Schedule sets out the processing of personal data relating to KCCT Trustees.

What personal data do we process?

- Name
- Address
- Email address
- Telephone

Where do we obtain personal data from?

Personal data is received direct from the Trustee.

The provision of personal data is a necessary requirement for the Trustee to fulfil the role of a Trustee of the KCCT.

Trustees are under a statutory obligation to provide personal data in order for the KCCT to comply with statutory and regulatory requirements.

Why do we process personal data and what is the lawful basis?

We process personal data for the following purposes:

- Administration of the KCCT and communications relating to trusteeship Contractual Necessity
- The performance of requirements upon Trustees under the Trust Deed and statutory obligations as required by the Charity Commission Legal Obligation

How long do we hold personal data for?

Personal data is retained for the duration of trusteeship of the Kennel Club Charitable Trust.

Recipients of personal data

- **The Kennel Club Ltd:** personal data is disclosed to the Kennel Club Limited who provide Data Processor services and facilities to the KCCT.
- **The Charity Commission:** personal data is also disclosed to the Charity Commission in accordance with statutory requirements.

Do we use personal data for any automated decision-making?

No automated decision making is taken using personal data.

Any financial data arising from a transactional process will be held securely by the Kennel Club Finance Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.

Schedule 2 – Kennel Club Charitable Trust Ambassadors

This Schedule sets out the processing of personal data relating to Kennel Club Charitable Trust Ambassadors.

What personal data do we process?

- Name
- Address
- Email address
- Telephone

Where do we obtain personal data from?

Personal data is received direct from Ambassadors, the data subject.

The provision of personal data is necessary for the Kennel Club Charitable Trust to facilitate the work of its Ambassadors. Ambassadors are not obliged to provide personal data. However, if personal data is not provided, the KCCT will be unable to facilitate Ambassadors' roles, as we will be unable to meet the statutory requirements to record this data.

Why do we process personal data and what is the lawful basis?

We process your personal data for the following purposes:

- | | |
|--|-----------------------------|
| • Administration of the KCCT and communications relating to ambassadorship | Contractual Necessity |
| • The performance of requirements under the Trust Deed and statutory obligations as required by the Charity Commission | Legal & Statutory Necessity |

How long do we hold personal data for?

Personal data is held for the duration of ambassadorship of the KCCT.

Recipients of personal data

- **The Kennel Club Ltd:** personal data is disclosed to the Kennel Club Limited who provide Data Processor services and facilities to the KCCT.
- **The Charity Commission:** personal data is also disclosed to the Charity Commission in accordance with statutory requirements.

Do we use personal data for any automated decision-making?

No automated decision making is taken using personal data.

Any financial data arising from a transactional process will be held securely by the Kennel Club Finance Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.

Schedule 3 – Donors to the Kennel Club Charitable Trust

This Schedule sets out the processing of personal data relating to donors to the KCCT.

What personal data do we process?

- Name
- Address
- Email address
- Telephone
- Financial information relating to donations

Where do we obtain personal data from?

Personal data is received direct from donors, the data subject.

The provision of personal data is a necessary requirement for the KCCT to administer its contacts with donors and facilitate donations.

The KCCT is obliged to meet statutory requirements in recording donations.

Why do we process personal data and what is the lawful basis?

We process personal data for the following purposes:

- | | |
|---|----------------------|
| • To facilitate donations to the KCCT and transactional communications | Legitimate Interests |
| • To comply with statutory obligations and Charity Commission requirements to record donors to the KCCT | Legal Obligation |
| • Publication of the names of recent donors in the Kennel Club Journal | Legitimate Interests |

How long do we hold personal data for?

Your personal data is held for a duration of seven years in accordance with statutory and regulatory requirements.

Recipients of personal data

- **The Kennel Club Ltd:** personal data is disclosed to the Kennel Club Limited who provide Data Processor services and facilities to the Kennel Club Charitable Trust in order to administer the charity.

Do we use personal data for any automated decision-making?

No automated decision making is taken using personal data.

Any financial data arising from a transactional process will be held securely by the Kennel Club Finance Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.

Schedule 4 – Kennel Club Charitable Trust Grant Applicants

This Schedule sets out the processing of personal data relating to Kennel Club Charitable Trust grant applicants.

What personal data do we process?

- Name
- Address
- Email address
- Telephone

Where do we obtain personal data from?

Personal data is received direct from grant applicants, the data subject.

The provision of personal data is a necessary requirement for the Kennel Club Charitable Trust to administer grant applications received.

Grant applicants are not obliged to provide personal data. However, if personal data is not provided, the KCCT will be unable to provide funding services, as we will be unable to meet the statutory requirements to record this data.

Why do we process personal data and what is the lawful basis?

We process personal data for the following purposes:

- | | |
|--|-----------------------------|
| • Administration and transactional communications relating to grants | Contractual Necessity |
| • The provision of funding services and facilitating grants from the KCCT | Contractual Necessity |
| • To comply with statutory obligations and Charity Commission requirements | Legal & Statutory Necessity |

How long do we hold personal data for?

Personal data is held for a duration of seven years in accordance with statutory and regulatory requirements.

Recipients of personal data

- **The Kennel Club Ltd:** personal data is disclosed to the Kennel Club Limited who provide Data Processor services and facilities to the KCCT.

Do we use personal data for any automated decision-making?

No automated decision making is taken using personal data.

Any financial data arising from a transactional process will be held securely by the Kennel Club Finance Department in accordance and compliance with all statutory, HMRC and Financial Authority requirements.