

PRIVACY POLICY

1. Introduction

This data protection and privacy notice provides information on how Aleto Foundation (also referred to in this notice as “Aleto”, “we” or “us”) uses personal data relating to users of our website. (referred to in this notice as “you”). Here at Aleto we collect and use personal data to manage our relationships with our young people and supporters, and to better understand how we can meet and exceed their expectations. This allows us to operate and fundraise more effectively to ultimately help us reach our goal that every young person should have the chance to succeed. Aleto is committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

This policy also contains information on marketing activities and the use of cookies on our site.

2. Why this policy exists

This Privacy Policy ensures we:

- Comply with the General Data Protection Regulation (GDPR) and follows good practice;
- Protect the rights of our stakeholders (employees, volunteers, supporters and our young people);
- Are open about how we store and process individuals’ data;
- Protect ourselves from the risks of a data breach.

3. Where do we collect information from?

We collect information in the following ways:

Information you give us

- Aleto may obtain personal information from you when, for example, you complete an online form to participate in a programme, register with us for a mailing list, apply to become a volunteer, take part in an event or make a donation.

Information from Third Parties

- We may also receive information about you from independent third parties, such as fundraising sites i.e. JustGiving, PayPal Fund, EasyFundraising, AmazonSmile or Virgin Money Giving or event organisers. We will only receive information from third parties in this way if you have given your consent for your information to be passed on to us. You should check their Privacy Policy when you provide your information to understand how they will process your information. Once we

have obtained this information from the third party it will be covered by our Privacy Policy as well as by the originating third party.

Information we get from your use of our website and services

- We collect information about the services you use and how you use them, such as when you watch a video on YouTube, visit our website or view and interact with our adverts and content.

Information in the public domain

- We may obtain some information from publicly available sources such as Companies House, newspaper articles or open postings on social media such as Facebook and LinkedIn.

4. What information do we collect?

The types of information the Aleto collects may include:

- Your title, name, gender and date of birth;
- Your contact details (address, email, phone number and social media contact details);
- Family and spouse/partner details, relationships to other supporters;
- Your professional activities and employment details;
- Current interest and activities;
- Gift aid status and records of donations;
- Contact preferences;
- Information about your wealth;
- Media articles about you;
- Your IP address, location, browser type and information on how you interact with our website;
- Your bank or credit card details in line with payment card industry standards; and,
- Any other information provided by yourself at the request of Aleto.

Where appropriate we may also ask your interests and motivation for supporting Aleto, although we will never make this a mandatory question, and only want to know the answer if you are comfortable providing us with that information.

In some limited circumstances, the personal information that the Aleto collects may include information that is considered 'sensitive data'. This may include personal information regarding racial or ethnic origins, political opinions, religious beliefs, health and also information concerning criminal offences. Where this information is collected we will tell you so you know why it is needed.

5. What might we do with your information?

If you have applied for one of Aleto's programmes, we will use your information to deliver, develop and evaluate the programmes.

If you support us, for example by making a donation, volunteering, registering to fundraise, or signing up for an event, we will mainly use your information to:

- Provide you with the services, products or information that you asked for;
- Provide you information about other services, products or information we think might interest where you have consented being contacted;
- Administer your donation or support your fundraising, including processing Gift Aid;
- Send you surveys, and for market research;
- Invite you to events;
- Keep a record of your relationship with us and record the contact we have you; and
- Ensure we know how you prefer to be contacted.

We may also use personal information to carry out due diligence in line with our ethical Fundraising Policy so that we are fundraising in accordance with the law, the code of fundraising practice and our internal policies and procedures.

6. Legal Basis for processing your information

Under the UK GDPR and the Data Protection Act 2018 (DPA), we must have a legal reason to collect, keep and use your data. We rely on the following legal basis for processing your data:

- Consent

- Legitimate Interests

We process your personal data for our legitimate interests to allow us to manage Aleto as a charitable entity and in pursuit of our objectives. When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you and your rights under data protection laws. We will always ensure that your personal data will not be used where our interests are overridden by the impact on you.

The following are some examples of instances where we process your data for our legitimate interest:

- **Direct Marketing** - We will send postal or online marketing and fundraising requests which further the aims and objectives of Aleto and do not unduly impact the rights of the individual.
- **Profiling and analysing information** - We carry out limited profiling and research to help us understand our donors and potential donors, including gathering information from publicly available resources to give an insight into philanthropic interest and ability to support Aleto.

Profiling and analysing information of our supporters

- In order to tailor what type and level of support we ask you for, we may analyse personal information we collect about you including how you have engaged with us previously, demographic information, measures of philanthropic interest and networks.
- We may also use information in the public domain, for example listed Directorships.
- In some instances, we may use third party screening companies or insight companies to provide us with general information about you (please refer to section 8 for further information on data shared with third parties).
- You can opt out of your data being used for profiling by contacting the Data Protection Officer.

7. How we update your information

We review records of our stakeholders to ensure your data is as accurate as possible and always appreciate it if you let us know if your contact details change. Where possible we use publicly available sources to keep your records up to date for example, the Post Office's National Change of Address database, or information provided to us by other organisations as described in Section 3. It is important we keep your personal data as up to date as possible so that we can cross reference your information with the [Telephone Preference Services \(TPS\)](#).

8. Who we share your information with

We are committed to protecting your data and therefore it will never be sold to external organisations and will only be disclosed to those acting as agents and data processors carrying out work on our

behalf. Where we enter into a relationship with an external party, any such arrangements will be subject to a formal agreement between Aleto and that organisation to protect the security of your data.

These Parties may include:

- **Suppliers** who send out communications on our behalf, such as invitations to our events, for example, MailChimp, EventBrite, JustGiving;
- **Insight companies** (see Section 4 for more information);
- **Our Trustees** where we share information for internal procedures and policies only. Should we merge with another organisation to form a new entity, your data may be transferred to the entity;
- **Our delivery partners** within the UK or abroad enable us to deliver our programmes effectively.

9. How to access, correct or delete your information

Under the General Data Protection Regulation 2016/679 you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email the **Data Protection Officer** (Head of Operations): sorraya@aletofoundation.org.uk

To help us locate any personal information about you (or in case we need to contact you to obtain further information to help us locate your records) please include your full name, email, address and telephone number with your request.

If you do not wish to receive any further information about the Aleto and would like us to remove your name from our mailing list, use the unsubscribe link in the email you have received or contact hello@aletofoundation.org.uk

10. How we keep your data safe

We aim to ensure that there are appropriate, physical, technical and managerial controls in place to protect any personal information you may provide to us.

We are committed to ensuring that your information is secure and protected against unauthorised or unlawful processing, accidental loss, destruction and damage. In order to prevent unauthorised access or disclosure, we use secure servers to store personal information. We also use Google Drive which is GDPR compliant.

11. How long do we store your data for

We will hold your personal information on our systems for as long as is necessary for the relevant activity. If you request that we stop sending you marketing materials we will keep a record of your

contact details and appropriate information to enable us to comply with your request not to be contacted by us, we won't keep any information that we don't need.

12. Contact us

If you have any queries about this Policy or any complaints with regards to the administration of the Privacy Policy please contact our Data Protection Officer - [Sorraya McGlothan](#)

You can also contact the Information Commissioner's Office (ICO) at www.ico.org.uk to find out more or report a concern. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. We work with them to make sure we collect, store, and use your information appropriately and not do anything you would not reasonably expect us to do with your data.

Aleto Foundation | Website: <https://aletofoundation.org.uk/> | Aleto is a registered charity in England and Wales | Charity No: 1138699

Creating A Legacy for TOMorrow by Sharing Success with Tomorrow's Leaders.