

Stephen Spender Trust Privacy Policy (the “Policy”)

This Policy explains what personal information Stephen Spender Trust collects online and how we use it. Please read it carefully.

By using our Sites - www.stephen-spender.org and www.multilingualcreativity.org.uk - you consent to the terms and conditions of this Policy. If you do not agree to the terms and conditions of this Policy please do not use the Sites.

Stephen Spender Trust is a data controller (i.e. a person responsible for the processing of your personal information) in respect of all the information which Stephen Spender Trust collects and receives about you when you use our Sites

Stephen Spender Trust is bound by, and uses your personal information in accordance with the General Data Protection Regulation 2016 (“GDPR”).

1. How we collect your information

We collect your information directly from you via our newsletter sign-up form, which directs you to our Mailchimp platform.

We also collect information through non-digital sign-up sheets and email communications. We collect information about entrants to the Stephen Spender Prize via a dedicated Microsoft Form and via printable entry forms.

2. Information we may hold about you and uses of your information

Stephen Spender Trust collects two types of information from you: (I) personal information, and (II) non-personal information:

I. Personal information is information that identifies you or can be used to identify you personally, such as your name or your email address;

II. Non-personal information is information that does not identify you and cannot be used to identify you personally.

We will use your personal information in accordance with the consent you have provided to us, or on the following bases:

➤ Legitimate business interest: We will process your personal data to pursue our legitimate interests in a way which you would reasonably expect and without any material impact on your freedom and rights.
For example, when you sign up to our newsletter via the website we will retain your details in order to keep you informed about our activities, unless you request for these to be deleted or for us to stop sending you our newsletter.

➤ Legal compliance: We will process and store your personal data when we are required to do so by law.
For example, if you are an author, translator or other practitioner contracted by Stephen Spender Trust we will retain your invoice for financial audits for up to 7 years.

➤ Contract: We will process and store your personal data when doing so is necessary in order to fulfil our contractual obligations.
For example, if you are attending a Stephen Spender Trust event we will use your information for event-management purposes (such as informing you of changes to the programme, informing you of cancellations, assigning seating, managing

effective catering, etc).

Stephen Spender Trust may use your non-personal information, such as aggregated age and region (without the inclusion of your name or any other personal information) to disclose to organisations approved by Stephen Spender Trust for analysis purposes.

Unless you withdraw your consent (see point 3), we will keep your information for as long as is necessary for the purpose for which it is collected or used. The actual time will depend on the type of relationship you have with us, the nature of the data and the purpose for which it is used. However, we will periodically review all data to ensure our records are accurate and up-to-date and delete any data no longer required for our legitimate interests or any other purpose (such as for legal compliance) after 7 years.

Please also keep us informed if your information is no longer accurate or up-to-date.

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3. You have certain choices about how we use your information

In line with the GDPR, when Stephen Spender Trust processes your personal data you have the right to request:

- Access, deletion of or correction of your personal information
- Your personal information be transferred to another person

If you wish to exercise these rights or have any questions or complaints about this Policy or any privacy concerns, please contact info@stephen-spender.org. Please do not include your credit card number or other financial or sensitive information in your email.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to withdraw any consent you have provided to us, to amend any information we hold about you or to request copies of the information we hold about you please write to us at info@stephen-spender.org.

To stop receiving our newsletters you can either click on the “unsubscribe” link at the end of each newsletter or write to info@stephen-spender.org.

In addition to the above rights, you have the right to make a complaint to us or to the regulator about the use of your personal information if you feel we have been intrusive to your privacy or misused your data (see <https://ico.org.uk/make-a-complaint/>).

4. We may share your information with the following third parties

In line with the GDPR, we may share your information (see 2 (ii) above) with the following third parties in line with our legal and contractual obligations:

- o Reporting to funders
- o Reporting to (event) partners
- o Reporting about past activities in our publicly available company reports

In the event that we are required by any of the above parties to share your personal or sensitive information, we will ensure that you are informed in advance.

5. We use standard security measures

In accordance with GDPR (art. 32) we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. That is, the standard security measures we use will depend on the type of information collected. However, the Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

6. We may link to third party sites or services we do not control

If you click on one of those links, you will be taken to websites we do not control which may allow third parties to collect or share data about you. This Policy does not apply to the privacy practices of those websites. Read the privacy policy of other websites carefully. We are not responsible for these third party sites.

7. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8. Young people under the age of 18

Stephen Spender Trust collects personal information from young people under the age of 18 if they enter the Stephen Spender Prize and/or the Polish Spotlight Prize. This data ensures that we can (a) contact winning and commended entrants; (b) assess eligibility for the competition; (c) aggregate non-personal data for evaluation purposes. The data stored is: name of parent/guardian, entrant’s full name, email address, telephone number and date of birth. In addition, young people aged under 13 need to submit a permission form from a parent or guardian in order to enter the Stephen Spender Prize and/or Polish Spotlight Prize.

All data about young people under the age of 18 is held by the Trust in a secure environment and is used for no other purpose than this Prize activity, nor knowingly passed to any other organisation or person not associated with or authorised by the Trust. Data from email entries is held by our host 123-reg in its data centre in Leeds, UK. Data from entries via Microsoft Forms is stored on Microsoft servers in Europe.

We hold the data until the competition has closed and the results announced, in November of each year. At this time personal data relating to prize entrants aged under 18 is deleted.

If you are at least 13 but under the age of 18, you must have your parent or legal guardian's permission to use or access the Site.

9. Who we are

We are Stephen Spender Trust, a charity (registration 1101304) and company limited by guarantee (Company Registration No. 4891164). Our registered address is:
Railview Lofts, 19c Commercial Road, Eastbourne, East Sussex BN21 3XE

You can find out more about us by emailing us at info@stephen-spender.org or visiting our website here: www.stephen-spender.org

Data Protection Officer: Charlotte Ryland, info@stephen-spender.org

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This notice was last updated on 10 June 2020. We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, you will be notified by email. Please check back frequently to see any updates or changes to our privacy policy.