

East Grinstead Memorial Estate Ltd

Policy No. 11 Privacy

Purpose of the Policy

- To ensure the Trustees of EGMEL protect your personal information.

Policy

Our contact details:

East Grinstead Memorial Estate Ltd (EGMEL)

East Court, College Lane, East Grinstead, West Sussex, RH19 3LT

E-mail: datacontroller@egmel.co.uk

Date: 29 March 2023 and revised 05.11.2025

The current legislation for Data Protection is:

UK General Data protection Regulation (UK GDPR) and The Data Protection Act 2018 (DPA 2018)

New legislation has been recently been passed, this being the Data (Use and Access) Act 2025 and new guidance is due to be published by the ICO late 2025. We will undertake another review of this Policy in early 2026.

This Privacy Policy (Policy) describes the “Personal Data” that we collect about you, how we use it, how we share it, your rights and choices, and how you can contact us about our privacy practices. This Policy also outlines your data subject rights, including the right to object to some uses of your Personal Data by us.

1. We need to collect, process and store the minimum amount of personal information in order to provide a service to you and comply with our legal and fiduciary responsibilities. These include:
 - 1.1 Personal identifiers, contact address, e-mail address and telephone numbers
 - 1.2 Other information relating to Grant applications.
2. The personal information we process is provided to us directly by you for the following reasons:
 - 2.1 Application and subscription for annual Membership
 - 2.2 Donations
 - 2.3 Application and assessment for annual Grants
 - 2.4 Reporting on Projects using our Grants.
3. We use the information that you have given us in order to:

- 3.1 Compile our Membership records
- 3.2 Enable distribution of a regular Newsletter by e-mail and any other relevant information such as Notice of Meetings.
- 3.3 Decide and award of Grants

4. Membership data:

We share the membership information with the Membermojo organisation who manage our Membership web site; Membermojo acts as our Data Processor.

For details of their Privacy Policy please log into the Members web site (East Grinstead Memorial Estate Ltd membermojo.co.uk); at the bottom of the page click on to the link “GDPR”.

5. We do not share your information with any third party other than Membermojo (see para 4 above).
6. EGMEL are the Data Controller under the legislation.
7. Under the current Data protection Laws (UK GDPR and DPA 18), the lawful bases we rely on for fairly and transparently processing and storing your personal information are:
 - 7.1 Your consent. When you provide your personal information on line or by post, you are providing your explicit consent to the collection and retention of any information that we keep on our database.
 - 7.2 You are able to remove your consent at any time. You can do this by contacting: datacontroller@egmel.co.uk
 - 7.3 We have a contractual obligation related to your Membership
 - 7.4 We have a legitimate interest in order to provide a service to you and for legitimate interests of the charity. We also have to comply with legal obligations such as providing full and accurate information to the Charity Commission.

8. How we store your personal information:

- 8.1 Your information is securely stored; we use a cloud-based service – BOX that has various security layers accessible only by the Trustees.
- 8.2 We keep the personal information you have consented to send us for 12 calendar months after your Membership has expired/ not been renewed. We will then securely dispose of your information.
- 8.3 In the case of Grant Applicants, where Charities and organisations submit information as part of the annual application process, we keep the information for a period not exceeding twenty-four (24) months unless a grant was awarded; in this instance we legally have to keep financial records for six (6) years from the end of the financial year to which the event relates.

9. Your data protection rights: Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get your personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you asked for.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please initially contact us at: datacontroller@egmel.co.uk if you wish to make a request.

10. How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at: datacontroller@egmel.co.uk

If you are not satisfied with our response as to how we have used your data, you may also complain to the ICO.

The ICO's contacts are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113 ICO

website: <https://www.ico.org.uk>

Responsibilities

- All Trustees

Approval

This policy was approved by the EGTEL Board on 6th January 2026

And an annual review is due on or before 31st January 2027

