



Sophie's Moonbeams Trust Data Protection Policy 1/6/2019

A. The Charity's purposes for processing data

1. Sophie's Moonbeams Trust ("the Charity") processes personal data, including sensitive personal data, in a way that is lawful, necessary, proportionate, and fair.
2. It is necessary for the Charity to process personal data so that beneficiaries can receive grants from the Charity.
3. The Charity processes personal data about individual applicants, for the purposes of considering and determining applications for a grant. Applicants includes the potential beneficiaries, their parents/guardians and the applicant who submits the application on their behalf.
4. The Charity maintains an anonymised subset of the data received from all applications, whether successful or not. This is done so that:
 - a. it can review the past performance of the application assessment process in relation to its charitable objectives;
 - b. it can review the types grants it has awarded in the past;
 - c. it can takes steps to ensure that it is using its funds in the best possible way to achieve its charitable purposes, which may mean deciding not to award multiple grants to a beneficiary;
 - d. for its accounting purposes.
5. Only data that is provided by consent, or for the applicant's legitimate interests, is processed by the Charity for the above purposes.
6. An application submitted to the charity for a grant is freely given consent to the processing of that data by the Charity. The purposes of processing data by the Charity is specific, as set out in this policy. To ensure that consent is informed, the Charity provides a copy of this data policy on the Charity website.

B. Third Parties

7. The Charity will never sell personal data that it holds to any third parties.
8. The Charity will not pass on personal data that it holds to any third parties unless it has the applicant's express written consent to do so, or where it is required by law. As the Charity's beneficiaries are children, it may receive consent on the child's behalf from their parent or legal guardian.
9. It may sometimes be necessary for the Charity to pass on personal data about a data subject in order to process an application; the Charity will ensure it has consent before doing so. Such consent may include written consent in the application form for another individual or organisation to be contacted in relation to the applicant.
10. The following are some example situations where personal data may be shared by the Charity with third parties:
 - a. the Charity may need to pass on an applicant's name and address to allow delivery of a product that is being provided to a beneficiary as a grant;
 - b. the Charity may need to contact a professional, organisation, or charity about the application. It will only do this if it has consent from the applicant in the application form or separate express written consent to make that contact, such as in an email to the Charity;
 - c. the Charity may need to pass on personal data to a provider of therapy or an assessment that forms the basis of the grant. For example, if an application is made for a therapy, the Charity will need to make payment to the therapy provider directly and therefore give sufficient details to that provider to identify the beneficiary of the grant.

C. Data Storage

11. The Charity only collects and stores personal data for the specific purposes set out above.
12. The Charity keeps personal data secure by the following processes:
 - a. Applications are submitted from the web site and held in a secure database on the web hosting server;
 - b. Access to applications data requires a password limited to trustees/officers of the Charity;
 - c. At regular intervals, the applications are removed from the database on the web hosting server and transferred to a fully encrypted database held in cloud storage;
 - d. Once an application has been fully processed it is deleted from the database and an anonymised subset of the application information is added to a separate fully encrypted database held in cloud storage;

- e. An application is deemed to be fully processed if either it is unsuccessful or the grant had been paid and a grace period of up to six months has expired.

13. The anonymised data stored for all applicants is as follows:

- a. Initials of beneficiary name;
- b. Age of beneficiary at time of application;
- c. Summary of beneficiary's status/needs;
- d. Town or city where first parent/guardian lives;
- e. Date of application;
- f. Date of grant (if any);
- g. Amount awarded (if any); and
- h. The form of grant awarded (if any), including when payment was made and the name of the provider.

14. Data subjects may see the information the Charity holds about them on request, as required by law.

D. The right to have personal data erased

15. The Charity will erase personal data when such a request is received from the data subject, their parent or legal guardian, or the original applicant if this is someone else.

E. Data breaches

16. In the case of any data breach, the Charity will comply with the notification requirements as required by law.