

# PRIVACY NOTICE MAIN JIGSAW TRUST

## **This privacy notice describes how we collect and use personal information, in accordance with the UK General Data Protection Regulation (UK GDPR) and other appropriate legislation.**

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This Notice sets out the basis on which any personal data is collected from you, or that you provide to us, how it is handled and stored to meet data protection obligations and standards and conditions under which we may disclose it to others.

**Data Controller:** Jigsaw Trust (incorporating Jigsaw Trust, Jigsaw CABAS® School, JigsawPlus and Jigsaw Trading (2013) Limited)

## **Who we are**

Jigsaw Trust is a registered UK charity and oversees and runs different divisions and legal entities. This Privacy Notice is issued on behalf of those different divisions and legal entities and any mention of 'Jigsaw', 'we', 'us' or 'our' in this Notice, refers to the relevant division or legal entity responsible for processing your data (ie. data controller) within Jigsaw Trust.

### **Jigsaw Trust**

UK Registered Charity Number: 1075464  
Registered Company Number: 3734127  
Registered Address for all divisions/legal entities:  
19-20 Bourne Court, Southend Road, Woodford Green, Essex, IG8 8HD (0208 551 7200)

### **Jigsaw CABAS School**

UK Registered Charity Number: 1075464  
Jigsaw Trading (2013) Ltd, t/a Cafe on the Park  
Registered Company Number: 08594365

### **JigsawPlus**

UK Registered Charity Number: 1151727  
Registered Company Number: 08278978

## **Personal data we collect**

All personal data collected, used, recorded is done so in accordance with applicable data protection legislation and this Privacy Notice.

The data can be categorised as follows and may include, but not be limited to:

**Personal data:** eg. first name, last name, dob, age, email, telephone, marketing preferences, GiftAid/tax paying status, salary information, banking details

**Financial data:** eg. general business accounting, invoices, non-identifiable general transactions

**Special Category data:** eg. medical information, safeguarding information, financial information relating to special category data

**Technical and Usage data:** eg. IP address, browsing patterns on our websites, Google Analytics

**Other – Non-Personal data:** eg. Summary for reports, statistical data, policies and anonymous teaching/learning resources

Please view our Data Protection Policy for further examples under Data Categories. Policies are available on our Policies page on the website <https://jigsawtrust.co.uk/policies/>

## How personal data is collected

We collect personal data in the following ways:

**Inbound Direct Interactions** - maybe, but not limited to, you corresponding with us via email, on the telephone, by post, completing contact forms on the websites, completing forms (hard copy), etc

**CCTV** - JigsawPlus site operates CCTV for safety and security

**Trusted Third Parties** - including but not limited to Local Education Authorities

**Technical** - Google Analytics and other Cookies are used on the websites – data is collected in a way that does not directly identify anyone. See our separate Cookie Policy. You can also view information on Cookies and how to disable them on your browser at: <https://allaboutcookies.org> or <https://aboutcookies.org>

## How we use personal data

Personal data may be used to ensure we respond effectively and appropriately to your contact. It may, where you have given consent, be used to update you on Jigsaw news, developments and activities. We may use personal data for one or more of the following activities: general marketing; publicity; fundraising; admissions process for Jigsaw CABAS School and JigsawPlus; to support and educate pupils at Jigsaw CABAS School and adult learners at JigsawPlus; recruitment; to provide a positive user experience on our websites; employees (including volunteers); finance, IT, governance of the Charity/Organisation. Activities will be used under one or more of the lawful bases described in law.

## Lawful basis

We will only use your information when the law allows us to, including processing information without knowledge or consent where this is required or permitted by law. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- Legitimate interest that satisfies the 3-part test (purpose behind the processing; necessity of the processing for that purpose; balancing of legitimate interest with the individual's interests, rights or freedoms).

## Sharing/disclosure of personal data

We may need to share your data with trusted third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy, or we are legally required to do so.

**Sharing of Pupil Data**– Please review our Pupil and Parent Privacy Notice for full details of how we collect and use personal information about pupils in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

**Sharing of Adult Learner Data**– we will share adult learner information with relevant Local Authorities and associated bodies, eg. NHS/emergency services, on a statutory basis.

**Third Party Providers** – occasionally, we employ other companies and individuals to perform necessary business functions on our behalf, including, digital/technical agencies and support providers, hosting providers, payroll services, digital educational and communication platforms, social networks, fundraising event services and general businesses consultancy services. They may have access to personal information needed to perform their requested function but will not be allowed to use it for other purposes and any processing must be done in accordance with this Privacy Notice, our Data Protection Policy and General Data Protection Regulations in force.

Further information can be found in our Data Protection Policy – to view this policy click here <https://jigsawtrust.co.uk/policies/>

## Data security

We take the security of personal data very seriously and have policies and controls (both technical and organisational) in place to ensure personal data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by those who are authorised.

Please be aware transmission of data over the internet is inherently insecure and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping any passwords and user details confidential. We will never ask you for your password.

## Data retention

Except as otherwise permitted or required by applicable law or regulation, reporting or accounting requirements and/or in accordance with best practice or our internal policy, the Trust only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy, available by request via [dataprotection@jigsawtrust.co.uk](mailto:dataprotection@jigsawtrust.co.uk)

## Transferring data outside the EEA

Data may be transferred to countries outside the European Economic Area (EEA) to meet the requirements of staff training and development or to utilise the most appropriate digital education and communication platforms or data management software.

## Breach reporting

Any individual who suspects that a personal data breach has occurred must immediately notify the Data Protection Officer above providing a description of what has occurred. If a breach is potentially high risk to a data subject's rights and freedoms the Trust must notify the data subject affected.

## Your legal rights

Right to withdraw consent: in circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email Jigsaw's Data Protection Team at [dataprotection@jigsawtrust.co.uk](mailto:dataprotection@jigsawtrust.co.uk).

Subject access request: under data protection legislation, everyone has the right to request access to information about himself or herself that we hold.

Subject access requests from individuals should be made by email, addressed to [dataprotection@jigsawtrust.co.uk](mailto:dataprotection@jigsawtrust.co.uk) (see contact details below). We will always verify the identity of anyone making a subject access request before providing any information. A response to any formal request for information will be provided within 30 days of receipt of written request. If providing the information requested by the data subject would disclose personal data about another individual then the information will be redacted or withheld as may be necessary or appropriate to protect that person's rights.

- All individuals who are the subject of personal data held by us are entitled to:
- Ask what information we hold about you and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how we are meeting our data protection obligations
- In certain circumstances, request rectification, restriction or deletion of your personal data

## How to raise a concern

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that, in the first instance, you contact **Jigsaw's Data Protection Team** - [dataprotection@jigsawtrust.co.uk](mailto:dataprotection@jigsawtrust.co.uk)

We have also appointed an external Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Jigsaw's in-house Data Protection Team, then you can contact the external DPO at:

**Data Protection Officer:** Judicium Consulting Limited  
72 Cannon Street, London EC4N 6AE

**Email:** [dataservices@judicium.com](mailto:dataservices@judicium.com)

**Web:** <https://www.judiciumeducation.co.uk/>

**Lead Contact:** Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues. They can be contacted at <https://ico.org.uk/make-a-complaint/>

## Changes to this privacy notice

We reserve the right to update this privacy notice at any time.

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