1. Purpose

At First Step Trust and SMaRT Garage Services, we are committed to protecting your privacy and ensuring that your personal data is handled in a secure and transparent manner. This Privacy Notice explains how we collect, use, store, and protect your personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the 2018 Data Protection Act (DPA) and other relevant data protection laws.

By using our website or providing us with your personal information, you acknowledge and agree to the terms outlined in this Privacy Notice. We may update this Notice periodically to reflect changes in law or our data practices, so please review it regularly.

2. Principles of Data Protection

We adhere to the principles of data protection by ensuring that personal data:

- Is processed lawfully, fairly, and transparently.
- Is collected for specified, explicit, and legitimate purposes.
- Is adequate, relevant, and limited to what is necessary.
- Is accurate and, where necessary, kept up to date.
- Is retained only for as long as necessary.
- Is processed in a manner that ensures appropriate security.

3. Information We Collect and How We Use It

We may collect and process the following personal data:

3.1 General Personal Data

- Name, postal address, email address, and telephone number when you contact us, use our services, or participate in our programs (e.g., registering for a training course such as driving ambition, SMaRT Women or other, using our garage services, applying for a workforce placement, applying for a job, joining our mailing list etc).

3.2 Additional Information

Depending on your relationship with us, we may collect additional information:

- **Employees:** Health data, employment history, bank account details, identification documents, information relating to criminal convictions or offences (for legal and payroll processing, and regulatory compliance, including DBS checks), references, emergency contact details.
- **Volunteers / Workforce (incl. applicants):** Health data, employment history, ethnicity, gender identity, age range, information relating to criminal convictions or offences (for application processing, safeguarding purposes and legitimate interest).
- **Visiting Trainees:** Health data, employment history, ethnicity, gender identity, age range (for eligibility and legitimate interest).
- **Customers:** Vehicle registration details for garage services.

- **Donors:** Payment details for processing donations.

We will only use your data for the purpose it was collected and where we have a legal basis to do so.

4. Legal Basis for Processing

We process personal data under the following lawful bases:

- **Consent:** When you have given explicit consent for marketing communications or sensitive data processing.
- **Contractual Obligation:** Where processing is required to fulfil a contract (e.g., service agreements).
- **Legal Obligation:** Where processing is necessary to comply with a legal requirement (e.g., HMRC payroll regulations, Charity Commission compliance).
- **Vital Interests, Safeguarding:** In cases where processing is necessary to protect someone's life or well-being.
- **Legitimate Interest:** Where processing is necessary for our legitimate business interests, provided these do not override your rights and freedoms (e.g., analytics, service improvements, etc).

5. How Long We Retain Your Data

We retain personal data only as long as necessary for the purposes stated in this Notice, including fulfilling legal, accounting, or reporting requirements. Retention periods may vary depending on:

- The nature of the data.
- The legal basis for processing.
- Regulatory or contractual obligations.

When data is no longer needed, we securely delete or anonymise it.

6. Your Data Protection Rights

Under data protection law, you may have rights including:

- **Right to Access:** Request a copy of your personal data.
- **Right to Rectification:** Request corrections to inaccurate or incomplete data.
- **Right to Erasure ("Right to be Forgotten"):** Request deletion of your data where no longer necessary.
- **Right to Restrict Processing:** Request a limitation on how we process your data.
- **Right to Data Portability:** Request to receive your data in a structured format.
- **Right to Object:** Object to processing based on legitimate interests or direct marketing.
- **Right to Withdraw Consent:** If processing is based on consent, you can withdraw this at any time.

To exercise any of these rights, please contact us at **privacy@firststeptrust.org.uk**. Please note that some rights apply only in specific circumstances.

7. How We Keep Your Data Secure

We have implemented appropriate technical and organisational measures to safeguard personal data from unauthorised access, loss, or misuse, including:

- Secure physical and online data storage and restricted access to sensitive information.
- Encrypted communications and secure transaction processing.
- Regular security audits and staff training.

However, no internet-based system is completely secure. While we take precautions to protect your data, we cannot guarantee absolute security.

8. Sharing Your Personal Data

We will not sell or share your personal data for marketing purposes. However, we may share data:

- With trusted third parties who support our services (e.g., payment processors), ensuring they comply with strict confidentiality agreements.
- With regulatory authorities or law enforcement where required by law.
- With statutory agencies, trusts and foundations for charitable funding purposes.
- Where necessary to protect individuals at risk.

9. Sensitive Data Handling

If you provide us with sensitive personal data (e.g., health information), we will treat it with enhanced protection and will only be used as aggregated or anonymised data for our annual performance and funding reports.

10. Third-Party Links

Our website may contain links to third-party websites. We are not responsible for their privacy practices and encourage you to review their privacy policies before submitting any personal data.

11. Contacting Us

If you have any questions about this Notice or how we handle your data you can contact us at: privacy@firststeptrust.org.uk First Step Trust, Unit 9 Kingside Business Park, Ruston Road SE18 5BX

You also have the right to lodge a complaint by also emailing our **Data Protection Officer** with the email above or with the **Information Commissioner's Office (ICO)** in the UK at www.ico.org.uk**.**

Cookies Statement

Doc No.: FST/DP/011

This cookies statement applies to the First Step Trust website, which can be found at https://www.firststeptrust.org.uk/. This website is run by First Step Trust Charity Ltd.

1. What are cookies?

Cookies are text files that are stored on your web browser by a website's server. Each cookie is unique to your browser and will contain some anonymous information such as a unique identifier and the website domain name.

This information is sent back to the server each time your browser requests a page from it. This enables the website server to identify and track your web browser via your unique, anonymous, identifier.

2. Are there different types of cookies?

First Step Trust uses cookies that fall into these three categories. These cookies may be created by First Step Trust's website, or by third-party services that First Step Trust uses, to enable its website to be run effectively.

- Necessary cookies: Necessary cookies are essential to the running of a website. Without these cookies, it is not possible for the site to function properly. For example, necessary cookies allow you browse or allow you to log in to secure areas of a website.

- Functional cookies: Functional cookies enable a website to operate in line with the choices you make. For example, they allow the website to remember how you may have previously customised the site for future visits or ensure that you stay logged in when you return to the site in the future.

- Analytical cookies: Analytical cookies allow the website owner, and any approved third-party services, to collect data on how visitors use that website. For example, analytical cookies can show information on how many visitors a page on the website has had. These cookies do not contain any personal information and are used to help improve your experience on a website.

3. Can I be identified from my cookies?

Any information that is collected by First Step Trust via cookies is processed in a way which does not, and cannot, identify an individual person. We do not make any attempt to find out the identities of those visiting the First Step Trust website.

If we do want to collect personally identifiable information through our website, we will be up front about this (for example, when requesting your contact details to process an enquiry). We will make it clear when we collect personal information and will explain what we intend to do with that personal information in our privacy notice.

4. Are cookies compulsory?

Necessary cookies are essential to the running of our website and are exempt from the requirement of consent as per the GDPR and PECR.

Functional and analytical cookies are all optional, and we will only store these cookies on your browser where we have received your freely given, specific, informed, and unambiguous consent.

5. How can I opt-out of, or delete, the cookies on my browser?

After you have set your initial preference for cookies on the First Step Trust website, you can manage your consent and clear your cookies via your browser by clicking the padlock button beside the web address.

6. Contact

If you have any questions about this cookies statement or of our treatment of your personal data, please email privacy@firststeptrust.org.uk or write to:

Data Protection Officer

First Step Trust
Unit 9 Kingside Business Park
Ruston Road
London
SE18 5BX
Data Controller

First Step Trust's data protection registration number is Z8847713.