

About this policy

This is the privacy policy of Impact Buckingham (formerly Mitre Impact). It explains what personal information we collect through our website, www.impactbuckingham.com, and in the course of our charitable work, how we use it, and the rights you have. Our former website, www.mitreimpact.com, redirects to this site. Our registered charity number, 1216036, is unchanged following our change of name from “Mitre Impact” to “Impact Buckingham”. This policy takes effect from the date it is adopted by the trustees, shown at the end of this document.

1. Who we are

Impact Buckingham (“we”, “us”, “our”) is a small, volunteer-run charity in Buckingham, registered with the Charity Commission for England and Wales under number 1216036. We are a Charitable Incorporated Organisation. Our work is to help local families with children who are facing financial hardship — delivering festive hampers at Christmas, and, from 2026, support through the summer holidays.

We are the “data controller” for the personal information described in this policy. That means we are responsible for how it is collected and used. This policy covers our website and the personal information of our donors, fundraisers, supporters, volunteers and anyone who contacts us.

2. The information we collect

We keep the personal information we hold to a minimum. Depending on how you interact with us, this may include:

- **Donors and supporters.** Your name, email address and (sometimes) postal address, the amount and date of your donation, and — if you make a Gift Aid declaration — your home address and confirmation that you are a UK taxpayer. We usually receive this from the giving platform you donate through, rather than collecting it directly ourselves.
- **Fundraisers.** If you fundraise for us — for example by setting up an online fundraising page or contacting us about an event — your name, contact details and information about your fundraising.
- **People who contact us.** If you email, call, use a form on our website, or message us on social media, we collect your name, your contact details and the content of your message.
- **Website visitors.** Limited technical information collected through cookies and similar technologies when you use our website — such as your IP address, device and browser type, and the pages you view. See section 5.
- **Volunteers and trustees.** Names, contact details and the information we need to run the charity and meet our legal duties.
- **Families we support.** We do not collect or hold personal information about the families and children we help. Our partner schools identify families using their own professional knowledge and records (including Pupil Premium and free school meals information), and we deliver support through the school. We never ask families to come forward, and we hold no personal data about them.

3. How we use your information

We use personal information only for the purposes set out below. Data protection law requires us to have a “lawful basis” for each use, which we have shown alongside each purpose.

Why we use your information	Our lawful basis
Receiving, processing and acknowledging your donation, and keeping proper financial records	Our legitimate interests — to receive and account for the donations that fund our work, and to thank our supporters
Claiming Gift Aid on your donation, where you have made a Gift Aid declaration	Legal obligation — to keep the records HMRC requires — together with our legitimate interest in reclaiming Gift Aid
Responding to your enquiries, messages and requests	Our legitimate interests — to answer questions and stay in touch with our supporters and community
Helping you fundraise for us and recognising your support	Our legitimate interests — and your consent where we send you fundraising updates
Sending you news or updates about our work, if you ask us to	Your consent — which you can withdraw at any time
Running, maintaining and protecting our website	Our legitimate interests — and your consent for any non-essential cookies
Meeting our legal, accounting, safeguarding and regulatory duties	Legal obligation

Where we rely on legitimate interests, this means running a small charity efficiently and keeping in touch with the people who support it, while respecting your rights. You can object to this at any time (see section 9). We do not use your information to make decisions about you by automated means.

4. Gift Aid

If you choose to add Gift Aid to a donation, you make a declaration confirming that you are a UK taxpayer and that we may reclaim the tax on your gift. To claim Gift Aid we share the necessary details with HM Revenue & Customs (HMRC). We keep Gift Aid declarations and claim records for at least six years, as HMRC requires. If you stop being eligible for Gift Aid, or change your name or home address, please tell us so we can update or withdraw your declaration.

5. Cookies and similar technologies

Our website is built on WordPress and uses cookies and similar technologies — small files placed on your device. We use them in the following ways:

- **Essential cookies.** These are needed for the website to work properly and securely, including remembering your cookie choices. They do not require your consent.

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- **Content from other organisations.** To show you where we are, we embed a map from Google Maps, and we use Google Fonts to display the site's typography. When these parts of a page load, Google may receive technical information (such as your IP address) and may set cookies, under Google's own privacy policy.
 - **Analytics.** Where we use analytics to understand how visitors use the site so we can improve it, we only set non-essential analytics cookies with your consent.

You can control or delete cookies through your browser settings. Blocking some cookies may affect how parts of the site work. We keep our use of cookies under review.

6. Who we share your information with

We do not sell or rent your personal information, and we never share it for anyone else's marketing. We share it only where necessary:

- **Online giving platforms.** When you donate or fundraise through Stripe, JustGiving, Toucan Collect or PayPal Giving Fund, those platforms process your information under their own privacy policies and pass us what we need to receive and acknowledge your gift and to claim Gift Aid.
- **HMRC.** To claim Gift Aid on eligible donations.
- **Our bank.** We bank with NatWest, which processes donations paid into our account and helps us run our finances.
- **Service providers who help us operate.** For example our website host and email provider, who act on our instructions and only handle information as needed to provide their service.
- **Where the law requires it.** For example to comply with our legal, regulatory or safeguarding obligations, or a valid request from a regulator or authority.

7. Storing your information and international transfers

Your information is held securely, and access is limited to the trustees who need it to do their work. Some of the providers we use — for example payment platforms and Google — may process information outside the UK. Where they do, appropriate safeguards are in place, such as the UK Government's "adequacy" regulations or standard data protection clauses, so that your information remains protected.

8. How long we keep your information

- **Donation and Gift Aid records:** at least six years from the end of the relevant tax year or financial year, as required by HMRC and charity law.
- **Correspondence and enquiries:** only for as long as we need to deal with the matter, after which they are deleted.
- **Fundraiser details:** for the campaign and a reasonable period afterwards, then securely deleted or anonymised.

We securely delete or anonymise personal information once we no longer need it.

9. Your rights

Under UK data protection law you have the right to:

- be told how we use your information (which is the purpose of this policy);
- ask for a copy of the information we hold about you;
- ask us to correct information that is wrong or incomplete;
- ask us to delete information where there is no good reason for us to keep it;
- ask us to restrict or stop using your information in certain circumstances;
- object to our using your information where we rely on legitimate interests;
- ask us to transfer your information to another organisation, where this applies; and
- withdraw your consent at any time, where we rely on your consent.

To exercise any of these rights, please contact us using the details in section 12. We will normally respond within one month, and there is no charge. If you are unhappy with how we have handled your information, please tell us first so we can put it right. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at ico.org.uk.

10. Children

Our website and our services are aimed at adults — donors, fundraisers, supporters and volunteers — and are not directed at children. We do not knowingly collect personal information about children through our website; if you believe a child has provided us with personal information, please contact us and we will delete it. As noted above, we do not hold personal information about the children or families we support: that information sits with our partner schools.

11. Changes to this policy

We may update this policy from time to time. The current version is always available on our website, together with the date it took effect. Where a change is significant, we will make that clear.

12. How to contact us

If you have any questions about this policy or about how we use your personal information, or if you want to exercise any of your rights, please contact us:

Data protection contact	Peter Edwards, Chair of Trustees peter@impactbuckingham.com · 07739 102861
By post	Impact Buckingham, 1 Millfield, Greenway Business Park, Great Horwood, Buckinghamshire MK17 0NP
Information Commissioner's Office (ICO)	The UK's data protection regulator, if you wish to complain ico.org.uk · 0303 123 1113 Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Adopted by the Board of Trustees on: 15 September 2026

Next review due: June 2027

Signed on behalf of the Board of Trustees:



Signature: _____

Name: Peter Edwards, Chair of Trustees

Date: 15 September 2026