

ST NAZAIRE RAID MEMORIAL TRUST

Website Privacy Notice

Public website footer document · Version 3.4 · 31 August 2026

This Privacy Notice explains how St Nazaire Raid Memorial Trust (“the Trust”, “we”, “us”) collects and uses personal information through this website and in related communications, including the Trust’s school education outreach programme. It is the public-facing privacy notice and is aligned with the Trust’s Master Data Protection Framework v3.4.

1. Who we are

St Nazaire Raid Memorial Trust is the organisation responsible for the processing described in this notice.

Data Protection Contact: James Wilson-White. Email: chalksterww@hotmail.co.uk. Telephone: 07963 512886.

2. What personal information we collect

Depending on how you interact with us, we may process names, professional roles, work email addresses, correspondence, information you provide through forms or enquiries, consent or preference records, event or project information, and technical information associated with use of the website.

We do not ordinarily seek or require pupil personal data for the Trust’s school education outreach activity.

3. How we obtain personal information

We may obtain information directly from you, from correspondence and forms, from Trust records, and from publicly available sources where lawful and appropriate.

For the school education outreach campaign, named professional work contacts are deliberately identified from school websites and official public registers. The campaign targets relevant educational roles, including Head of History, Head of Humanities, Head Teacher and/or Head of Curriculum.

4. Why we use personal information

We use personal information to administer the Trust, respond to enquiries, manage volunteers and contributors, deliver heritage and education activities, communicate about Trust activities and resources, maintain appropriate records, protect our systems, and comply with legal obligations.

5. Lawful bases

Depending on the activity, the Trust may rely on legitimate interests, consent, legal obligation, contractual necessity or another lawful basis available under UK data-protection law.

For the school education outreach campaign, the Trust relies on legitimate interests under UK GDPR Article 6(1)(f). The Trust’s Legitimate Interests Assessment explains the purpose, necessity and balancing considerations for that processing.

6. School education outreach

The education outreach campaign is intended to distribute Operation Chariot educational resources and communicate with the people within schools most likely to have responsibility for history, humanities, curriculum or school-level educational decisions.

The campaign deliberately identifies named professional work contacts — Head of History, Head of Humanities, Head Teacher and/or Head of Curriculum — at approximately 7,100 UK secondary schools. Any expansion beyond the approved phase remains subject to the Trust's data-protection review and legitimate interests assessment.

The information collected for this campaign is limited to the school, relevant professional name and role, professional work contact details, source information where practicable, correspondence and suppression/opt-out status. Private home addresses and unrelated personal information are not sought.

The source of these named contacts is the relevant school website or an official public register. Public availability does not remove data-protection obligations where information identifies an individual.

7. Direct marketing and your right to object

Where a communication constitutes direct marketing, the Trust will assess and comply with applicable PECR requirements. You have an absolute right to object to direct marketing.

For education outreach opt-outs, contact education@stnazaireraid.org. Opt-outs are recorded in the campaign's permanent Do Not Contact/suppression register, which is checked before every send. During active send periods, a daily summary of opt-outs received and actioned is provided to the campaign owner.

8. What we share and who processes information

We may share personal information with service providers and professional advisers where necessary and lawful. Where a supplier processes personal data on our behalf, we use appropriate contractual, confidentiality and security arrangements.

For the education outreach programme, commissioned processing may include preparation, verification, management or delivery of the school contact dataset. The Trust's Trust-Gravey Data Processing Terms provide additional controls for the relevant commissioned work.

9. Artificial intelligence

The Trust uses AI tools in limited administration and programme delivery. No AI output is relied upon or published without human verification. The Trust does not use AI to make automated decisions about individuals, run public-facing chatbots, identify people in images, or train AI models on its collections or archive.

The Trust's Statement on the Use of Artificial Intelligence provides the detailed controls governing human verification, rights-cleared content, labelling, data protection, confidentiality and proportionality.

10. Cookies and similar technologies

The website uses necessary cookies and may use performance/analytics and marketing cookies. The Trust's separate Website Cookie Policy explains these categories and the controls available to visitors.

11. Security

We use proportionate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or disclosure.

12. Retention

We retain personal information only for as long as there is a lawful and appropriate reason to retain it. Retention periods depend on the purpose and type of record. Temporary working copies are normally deleted within 10 working days of task completion unless a longer period is authorised or a continuing lawful purpose applies.

Minimum information may be retained on a permanent Do Not Contact/suppression register where necessary to prevent inadvertent future contact.

13. International transfers

If personal information is transferred outside the UK, we will assess the transfer and apply the safeguards required by applicable data-protection law.

14. Your rights

Depending on the circumstances, you may have rights to access your personal information, have inaccurate information corrected, request erasure, restrict processing, object to processing, and obtain data portability where applicable. Where consent is the lawful basis, you may withdraw consent.

You may object to direct marketing at any time. For education outreach, use education@stnazaireraid.org.

15. Automated decision-making

The Trust does not make decisions about individuals based solely on automated processing, including profiling, that produce legal or similarly significant effects.

16. Complaints

If you have concerns about how we use your personal information, please contact the Trust first. You also have the right to complain to the Information Commissioner's Office (ICO).

17. Changes to this notice

We review this notice periodically and will update it when our processing changes or when legal or regulatory requirements change.

18. Related documents

Data Protection Policy · Website Cookie Policy · School Education Outreach Privacy Notice · Statement on the Use of Artificial Intelligence · Legitimate Interests Assessment — Schools Education Outreach Contact Data.