

## Data protection

The Sainsbury Family Charitable Trusts (SFCT) is the operating office of 17 different independent grant-making trusts established by members of three generations of the Sainsbury family.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.

We have policies, procedures and training in place to help our employees and volunteers understand their data protection responsibilities and follow the data protection principles.

We have a nominated member of staff who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk).

The purpose of this policy is to give you a clear explanation about how we collect and use your personal information.

## How we collect personal information

We collect and use personal information about:

- Grant applicants
- Beneficiaries
- Individuals at the organisations we work with
- Directors and trustees
- Employees
- Job applicants
- Volunteers
- Researchers
- Consultants
- Suppliers
- Reviewers
- Advisors

We may collect information about you from different sources, for example:

- From you directly when you:
  - Apply for a grant from us
  - Receive a grant from us
  - Register for one of our events
  - Participate in a campaign
  - Donate to us
  - Complete a survey
  - Apply to volunteer with us
  - Sign up via our website to hear news from us
- From other people who think that you may be interested in supporting the Trusts
- From the public domain when we think you may be interested in supporting the Trusts
- From you when you make an application to work for us, or from third parties such as your previous or current employers so we can verify details about you
- From external sources such as publications and works, patents and clinical trials, external reviewers or advisors when you apply for or are awarded a grant from us
- When you review grant applications for us
- From CVs provided to us in our applications

## The personal information that we use

We only collect personal information that we genuinely need.

This may include:

- Contact details such as name address, email address and phone numbers
- Nationality
- Date of birth
- Gender
- Qualifications
- Interests
- Dietary requirements where this is required for catering
- Bank account details
- Passport information
- Medical information
- Benefits received
- Employment details
- Photographs and video recordings
- Tax and residency status for statutory requirements
- We may also collect:
  - your bank account details, tax and residency status
  - references from previous employers or educational institutions
  - contact details for your family members and next of kin
  - information concerning your health and medical conditions
  - information about your race, ethnicity and sexual orientation
  - details of criminal convictions
  - benefits received

## Our legal basis for processing personal information

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights. For example, to process a grant application.

We may collect and use your personal information with your consent. For example, to send you marketing emails, to take and use your photograph, to collect relevant medical information. You can withdraw consent for this at any time.

We may also collect and use personal information as required to fulfil our legal obligations as a registered charity and employer.

Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details with the emergency services if we believe it is in your 'vital interests' to do so. For example, if someone is taken ill during one of our events.

## How we use personal information

We will only use your personal information for the purpose which it was provided to us for and in ways that you would reasonably expect.

## Grants to organisations and individuals

We collect and use personal information from individuals who:

- Are interested in applying for a grant for themselves or their organisations
- Apply for a grant
- Receive one of our grants

We process this personal information to pursue our legitimate interests as a funder (and your interests as an applicant) and fulfil our charitable aims.

### To identify potential beneficiaries

We may collect and use personal data to undertake research to identify potential beneficiaries

### If you enquire about applying for a grant

To assess your eligibility and suitability for a grant we will ask you to provide us with headline details and a brief cv which we may share with advisors.

We may also collect information about you and in relation to a potential application from external sources such as publications and works, patents and clinical trials, external reviewers or advisors to assess and advise you if a grant application would be considered.

### If you apply for a grant

If you apply for a grant we will use the personal information provided to us to consider and process the grant application. This may include:

- Name and title
- Contact details
- CVs – education, training and career information
- Nationality
- Details of proposal
- Letters of support
- With your consent, information relating to date of birth, gender, ethnicity and race and disability for diversity monitoring purpose.

The personal information may be in relation to individuals making an application, employees and trustees.

We may also collect information relating to applications, from external sources such as publications and works, patents and clinical trials, and possibly external reviewers or advisors.

To assess and review applications we may share personal information with:

- IP Agents
- Specialist assessors for programmes
- External reviewers and advisors who may be based at academic institutes or in the private sector.

We may also use and share the information provided to undertake monitoring and evaluation of award rates, trends in application decisions, and fairness and efficiency of application decisions.

### If you are awarded a grant

We already hold personal information from the application stage but we may now collect the following additional information:

- Bank details to award and administer your grant
- Grant spend information

- Annual and end of grant information
- Information relating to post-award issues such as requests for supplements or extensions
- Survey information collected during or after completion of the award
- Information relating to date of birth, gender, ethnicity and race and disability for diversity monitoring purposes (and only with your consent)

The prime use of the personal information is to award and manage grants. We also use it for monitoring, evaluation and reporting purposes so that we can consider important factors such as trends in funding areas, the impact and reach of our funding, and the demographic make-up of funding areas.

When legally obliged we will share grant recipients' personal information with HMRC for common reporting purposes.

We may need to share it with external reviewers and advisors (e.g. project oversight groups, grant monitors, evaluation specialists) to review, monitor or evaluate grants.

We may need to share your contact details with suppliers.

#### Awards and events

We may use the personal information of stakeholders, beneficiaries, funders and award nominees to invite you to our awards and events. For example, Ashton or Jerusalem awards.

If you register for one of our events, we will use the information you provide to us to process your registration and enable you to attend. We may also invite you to future events. This may include sharing some of your information with third parties that are involved in running an event. We may issue an attendees list at the event and publish the names of nominees and award winners on our website. Our legal basis for using your personal information in this way is legitimate interest.

If you choose to provide us with your dietary requirements, we may share them with third parties that we use to provide catering at our events. We will collect and use your dietary information with your consent.

#### Raising awareness of our work

We will collect personal information from our existing supporters and the public domain to research and identify potential new supporters and partners. Our legal basis for using your personal information in this way is legitimate interest.

We will use the contact details of new and existing supporters to inform you about our work. We will send you relevant information by post and / or email. Our legal basis for using your personal information in this way is legitimate interest. You can opt out or unsubscribe from receiving these communications at any time.

If you opt into our mailing list we will use the information that you provide to email you information about our events, campaigns and other items of interest. You can opt out or unsubscribe from receiving this information at any time if you wish. Our legal basis for using your personal information in this way is your consent.

#### Case studies

We only use your personal information in case studies when you have consented for us to do so. We will make it clear to you how we might use your information and who we may share it with; again, we will only do so with your permission. Our legal basis for using your personal information in case studies is your consent.

#### Photographs and recordings

We use photographs and recordings to promote the Trust and the work that we do. We take photographs and recordings of people that agree to be the subject of one of our case studies. We always obtain permission from the individual to take and use their image and explain how we intend to use it. Our legal basis for using personal information for this purpose is consent.

### Campaigns

If you choose to participate in one of our campaigns, we will use the information you provide to us as expected for that campaign. Our legal basis for using your personal information for campaigning is for the legitimate interest of the Trust and fulfil our objective to influence people to take decisions that will improve our lives and the lives of others. Any further email communications to you about the campaign will include an unsubscribe function to enable you to inform us that you no longer wish to hear about that campaign.

### Surveys

If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We will not share the personal information that you provide in a survey with any other organisations. Survey results will be anonymised before being shared or published. Our legal basis for using the personal information that you choose to provide to us in a survey is legitimate interest.

### Donations

If you kindly donate to us, we will use your personal information to collect your donation and maintain a record of our supporters. Our legal basis for using your personal information for this purpose is to fulfil our legitimate interest and to raise funds for our work.

### Travel arrangements

We will use the personal information including passport and medical information when making travel arrangements for employees, trustees and consultants. We may share some of this information with our insurance company and travel agents. Our legal basis for processing this personal information is legitimate interest. We will obtain your consent when collecting and using information relating to your health.

### Employee and volunteer recruitment

If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your enquiry. We will not store this information for any purpose other than that relating to your application. Our legal basis for using your information in this way is for our legitimate interest.

### Employee administration and payroll

We will process personal information of our employees to fulfil our contract with them. This includes payroll processing and the provision of training. We are required by law to share some financial information with the HMRC. We may also need to share some personal information with other organisations, for example solicitors, pension providers. We process employee personal information to fulfil our contracts with our employees and meet our legal obligations as an employer.

### Processing expenses and honoraria

If you claim expenses from the Trust or we pay you an honorarium, we will use your personal information including your bank account details to process your claim. Our legal basis for using your information for this is legitimate interest.

### Governance

SFCT

Privacy Policy (Last updated 28<sup>th</sup> October 2019)

We process relevant personal information about existing and potential trustee and committee members and directors for governance purposes.

We may undertake DBS and other checks to identify any criminal and other activity we need to be aware of. We will do this with your consent.

We will share some personal information with the Charity Commission, Companies House and HMRC.

Our legal basis for this processing is to meet our legal obligations with the Charity Commission and Companies House and other relevant regulatory bodies in other territories.

### Health and safety

We are legally obliged to collect personal information of employees, visitors and contractors for health and safety purposes. We may be required to share some of this information with HSE.

### Volunteers

We will process your personal information if you choose to volunteer with us. We will keep a record of your contact details, experience and qualifications. Our legal basis for using your information in this way is for our legitimate interest. It may also be necessary to run DBS and other checks to identify any activities we need to be aware of; we will seek your consent before doing so.

### Researchers

We will use the personal information of Researchers to commission research. Our legal basis for using your personal information in this way is for the performance of a contract.

### Consultants

We will use the personal information of Researchers to commission research. Our legal basis for using your personal information in this way is for the performance of a contract.

### Suppliers

We will use the personal information of contacts at suppliers to pay them. Our legal basis for using your personal information in this way is for the performance of a contract.

### Complaints and general enquiries

If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint. Our legal basis for using personal information for this purpose is legitimate interest.

## How we store personal information

We store personal information that we collect in relation to our grant applicants, beneficiaries, individuals at organisations we work with, event attendees, volunteers, consultants, and researchers in a client relationship management database which is used by all Trusts at SFCT.

## Cookies and aggregate information

We may use cookies and log files on our website to store information about how you use our website using Google Analytics. A cookie is a piece of data stored on the user's computer tied to information about the user. This information may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

This enables us to analyse the use of our website and services. We may also create a profile which details your viewing preferences. We use your profile to tailor your visit to our website, to make navigation easier and direct you to information that best corresponds to your interests and country. The legal basis for this processing is our legitimate interests, monitoring and improving our website and services. Please see our cookie statement for more information.

## Sharing personal information

We will not sell or exchange your personal information.

We will only share your personal information where we are required to fulfil our contract with you, or legitimate interest, where we have your consent, or we are required to do so by law.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers. Everything an external service provider does is strictly governed by a contract. In addition, before we share any information with those service providers, we put in place a signed Data Processing Agreement which confirms that the personal information we provide will only be used for the purposes we specify and will be processed in line with data protection legislation.

We may share some personal information in relation to grant applications with:

Advisors and reviewers

Funding partners e.g. the UK Research Councils, World Health Organisation, Royal Society

Partners and third parties such as universities and research institutes and for the purposes of monitoring, evaluation, research and learning

We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; our pension provider; and our IT support, Dynamics 365 service provider and data storage providers.

Where required, we will process personal information to comply with our legal obligations. In this respect we may use your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

## Transferring personal data outside of the EEA

We may need to collect or send some personal information outside of the EEA to individuals and organisations who are connected to or working on behalf of SFCT, for example we may send scientific applications to reviewers and assessors funding partners

If we transfer personal information to countries or jurisdictions which do not have a similar standard of data protection law in place, we will inform you in advance of the need to transfer the information and ensure that there is a contract in place with the recipient.

## Your rights

If you no longer wish to receive communications from us, please contact [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk) You can also unsubscribe at any time to mailings that we may send to you about our work and that we think will be of interest to you.

You also have the right to:

- Request a copy of the information we hold about you. Requests should be addressed to [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk). We will respond within 30 days of receiving your written request.
- Tell us to change or correct your personal information if it is incomplete or inaccurate. Please contact us at [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk).
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information. Please contact us at [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk).
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation. Please contact us at [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk).
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you. Please contact us at [dataprotection@sfct.org.uk](mailto:dataprotection@sfct.org.uk).

Please note that we may be entitled to refuse requests where exceptions apply: for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

## How long we keep your personal information

We will hold your personal information for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes.

## Changes to this policy

This Privacy Policy may change from time to time. Please visit this webpage periodically to keep up to date with the changes in our Privacy Policy.

## The Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal information in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.