

THE HEADLEY TRUST

PRIVACY NOTICE

INTRODUCTION	2
WHAT INFORMATION DO WE PROCESS?	4
PURPOSES AND BASES FOR PROCESSING YOUR DATA	6
SHARING YOUR INFORMATION.....	7
INTERNATIONAL TRANSFERS.....	8
YOUR RIGHTS.....	8
DATA RETENTION PERIOD	10
CONTACT US.....	10

PRIVACY NOTICE

INTRODUCTION

The Headley Trust (“Headley/we/us/our”) is one of 20 different independent, grant-making trusts established by members of five generations of the Sainsbury family.

Headley is a small independent funder working in several charitable areas. Our work embraces a wide range of interests, primarily:

- Arts & heritage in the UK - regional museums and galleries, with special consideration for curatorial support and acquisitions; the display, study and acquisition of British ceramics; conservation of industrial, maritime and built heritage; archaeology; arts education/outreach and access to the arts for disabled & disadvantaged people; Headley Museums Archaeological Acquisition Scheme.
- Cathedrals & major churches in the UK - restoration or repair work to the fabric of ancient buildings of exceptional architectural merit built before 1850.
- Parish churches in England & Wales – fabric repairs and improvements work to medieval parish churches in sparsely populated and less prosperous rural areas.
- Arts & heritage overseas - conservation and recording of heritage (architecture, archaeology, and artefacts), primarily in Southeastern Europe.
- Development projects in sub-Saharan Anglophone Africa – education, healthcare (trachoma prevention / treatment) and improved access to water.
- Education bursaries for conservation, dance and classical music studies in the UK.
- Health & social welfare – support for older people, carers and disadvantaged families and young people, and includes small grants to provide practical aids for disabled people.

THE HEADLEY TRUST

We share offices located at The Peak, 5 Wilton Road, London SW1V 1AP with other trusts which are operated by the Sainsbury Family Charitable Trusts.

Keeping your personal information safe is very important to us. We are registered as a data controller with the Information Commissioner's Office. Our registration number is Z6144191. Headley is committed to the protection of your personal data we process in line with the data protection principles set out in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 ("UK GDPR") and the Data Protection Act (2018).

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

We have a nominated member of staff who serves as our Data Protection Manager. If you have any questions regarding how we collect, store and process your personal data, please email dataprotection@sfct.org.uk. We have also appointed an independent Data Protection Officer at data protection consultants, Evalian Limited who can be contacted by email at dpo@evalian.co.uk.

This privacy notice explains what personal data we collect from individuals who visit our offices or contact us by email, phone, or apply for a grant or send us other communications ("you/your").

We place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. Headley is committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

If you have applied for a job with us or another trust or submitted your CV (or similar employment information) to us, we process your personal data as set out in our privacy notice for recruitment candidates (www.sfct.org.uk/privacy-notices).

THE HEADLEY TRUST

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices or other services we offer. When changes are made, we will update the date at the bottom of this document. Please review this privacy notice periodically to check for updates.

WHAT INFORMATION DO WE PROCESS?

Information you provide to us

We process all information you give us, either through corresponding with us by post, telephone, email or otherwise. This includes information you provide when you register your details with us, apply for a grant, a bursary or other service, participate in events, meetings and presentations, or attend social functions linked to our trust.

Information processed following an enquiry from you or when you submit a grant application to us (not for 'Aids for Disabled').

In relation to Arts & Heritage (UK & Overseas), Cathedrals & Major Churches, Parish Churches, Development Projects in Africa, Health & Social Welfare and Education Bursaries we process the following information:

- Your name (first and last).
- Organisation name.
- Organisation or personal address.
- Your job title.
- Organisation or personal telephone number.
- Organisation or personal email address.
- Grant amount awarded.
- Bursary beneficiaries only - student, course, and academic institution.

We use your name, organisation address, business email address and business phone number to respond to your enquiry and/or process your grant application.

During the course of our relationship with you, we may receive, though do not request, a copy of your CV or a photograph.

THE HEADLEY TRUST

Information processed following an enquiry from you or when you submit an 'Aids for Disabled People' grant application to us.

In relation to 'Aids for Disabled' applications we process the following information:

- Surname & first name of applicant with a disability.
- Address & postcode.
- Phone number.
- Nature of disability.
- Date of birth / age of applicant.
- Referring organisation (if any).
- Name and position of Referrer.
- Address, postcode, email address, and telephone number of Referrer.
- How long known the Applicant has known the Referrer.
- Grant amount awarded.
- Household income, including details of benefits and pension or tax credits.

We use your name, address, email address and phone number to respond to your enquiry and/or process your grant application.

During the course of our relationship with you, we may receive, though do not request, a copy of your CV or your photograph.

Information processed by us when you accept an invitation to attend one of our award ceremonies

We process the following information:

- Your name (first and last).
- Organisation name.
- Your dietary requirements if the event is catered.

Information we obtain from other sources

Indirectly, we may record or receive additional details about you from:

- Public information sources, such as your organisation's website, social channels (FaceBook page, Twitter account, LinkedIn profile, etc.), or from news articles and public registers, such as The Charity Commission.

THE HEADLEY TRUST

- People who think that you may be interested in applying for a grant.
- External sources such as publications and other published works, and external reviewers or advisors when you apply for or are awarded a grant from us.

Cookies & CCTV

We do not use cookies on our website to analyse the use of our website and services.

To ensure the safety of all our visitors, contractors and staff, SFCT and the Landlord's property managers capture and record CCTV images at the main entrances to our office buildings.

PURPOSES AND BASES FOR PROCESSING YOUR DATA

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. We may use your data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you or other type of enquiry.	It is in our legitimate interest to respond to enquiries made by phone, by email, through our social channels or any other means.
For assessing the suitability of the grant application.	When you submit a grant application to us we are processing it with your consent.
Sending you information such as newsletters, research reports, insights and other news about Headley and information which may be of interest.	When you agree to be sent further information about us, we will rely on your consent, which may be withdrawn at any time by emailing dataprotection@sfct.org.uk .
Fulfilment of our obligations, as set out in our grant awards, or other agreements.	This is necessary for the performance of the grant award or other agreement we have entered with you.
For charitable trust / fund management, forecasting and statistical purposes.	It is our legitimate interest to identify areas for improving charitable relationships,

THE HEADLEY TRUST

	developing new award opportunities and managing the charitable trust.
Processing relevant personal information about trustees and committee members of the grant recipients / award beneficiaries for governance purposes.	It is our legal obligation to comply with governance requirements of the Charities Act 2011, Charities (Protection and Social Investment) Act 2016, the Trustees Acts 1925, 2000.
Publicising the positive impact of the trust by publishing case studies.	Publication of your details, including photographs and recordings in our case studies is with your consent which can be withdrawn at any time.
Publishing our annual reports, which may contain grant award case studies.	Publication of your details in our case studies is with your consent which can be withdrawn at any time.
Invitation and attendance at our events.	<p>It is our legitimate interest to publicise and celebrate the work of the trust by holding charitable events.</p> <p>If you attend the event we will collect and use your dietary information with your consent.</p> <p>If you attend the event we may collect and use photographs and recordings with your consent.</p>

SHARING YOUR INFORMATION

We will not sell or exchange your personal information. We will only share your personal information where we are required to fulfil our grant award agreement with you, or legitimate interest, where we have your consent, or we are required to do so by law. Headley works closely with other Sainsbury Family Charitable Trusts and may share personal details with the other trustees, trust staff, but only if it helps support your needs.

THE HEADLEY TRUST

We may share your personal information with third party organisations who will process it on our behalf. This is strictly governed by data processing terms 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.

Other third parties we may share your personal data with include:

- Public bodies such as the Charity Commission for England and Wales, HM Revenues & Customs or the police. The legal basis in these cases is compliance with our legal obligations.
- In case of an emergency we may also share your information with the relevant public health and emergency services and contact your next of kin. The legal basis for processing in such cases is to protect your vital interests.

We are committed to transparency and publish a report annually about the trust's activities, Our annual reports do not contain personal data but may contain case studies about the grants awarded.

INTERNATIONAL TRANSFERS

Headley operates primarily in the UK, but also provides grant awards to organisations in Africa, primarily Sub-Saharan Africa and Southeast Europe. All grant application processing and award administration takes place in the UK.

Headley works with several advisors and suppliers and it is possible that we will share your data with other third-party suppliers that process your data in countries outside the UK where the data protection laws are not equivalent to those within the UK. Where this applies, we do so, either on the basis of an 'adequacy decision' or documented in an International Data Transfer Agreement (IDTA) approved by the UK Information Commissioner's Office (ICO) which contractually oblige companies in those countries to the standard expected within the UK. More information about these is available [here](#).

YOUR RIGHTS

THE HEADLEY TRUST

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- Request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format (“data portability”).
- Request erasure of personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of Headley.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject.

If at any time you decide that you no longer wish to be contacted for marketing purposes, or if you would like to exercise any of your rights as set out above, you can contact us by email. See ‘Contact Us’.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

THE HEADLEY TRUST

In addition to the above, please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

DATA RETENTION PERIOD

We will retain your personal data for as long as it necessary for the purpose of our relationship or until you object to us processing it or withdraw your consent. 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 or audit purposes.

CONTACT US

You can contact Headley in relation to data protection and this privacy notice by writing to:

Data Protection Manager
The Headley Trust
c/o Sainsbury Family Charitable Trust
The Peak,
5 Wilton Road,
London SW1V 1AP

Alternatively, you can email us at dataprotection@sfct.org.uk

Last updated: 27 September 2023.