

PRIVACY NOTICE

SAINSBURY FAMILY CHARITABLE TRUSTS

INTRODUCTION.....	2
WHAT INFORMATION DO WE PROCESS?	3
PURPOSES AND BASES FOR PROCESSING YOUR DATA.....	5
SHARING YOUR INFORMATION.....	7
INTERNATIONAL TRANSFERS	7
YOUR RIGHTS	8
DATA RETENTION PERIOD	9
CONTACT US.....	9

PRIVACY NOTICE

SAINSBURY FAMILY CHARITABLE TRUSTS

INTRODUCTION

The Sainsbury Family Charitable Trusts (“SFCT/we/us/our”) of The Peak, 5 Wilton Road, London SW1V 1AP is the operating office of 20 different independent, grant-making trusts established by members of five generations of the Sainsbury family.

Keeping your personal information safe is very important to us. We are registered as a data controller (SFCT Management Ltd) with the Information Commissioner’s Office. Our registration number is Z9561143. SFCT is committed to the protection of your personal data we process in line with the data protection principles set out in the UK General Data Protection Regulations (“UK GDPR”) and the Data Protection Act (2018).

We have policies, procedures, and training in place to help our employees and interns 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.

This privacy notice explains what personal data we collect from individuals (“you/your”) who

- Visit our offices or our website (<http://www.sfct.org.uk/>),
- 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
- Contact us using our web forms, by email, phone or through one of our social channels,
- Subscribe for our newsletter or other marketing communications, or
- Provide services to us.

We collect and use personal information about:

- Grant applicants and beneficiaries,
- Individuals at the organisations we work with,
- Directors and trustees,
- Volunteers,
- Researchers,
- Consultants, reviewers and advisors,
- Suppliers and contractors.

SFCT helps support the operations of our family trusts. Please refer to the corresponding trust privacy notices by clicking the links to the trust information or by visiting the trust's website (not all trusts have their own website).

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. SFCT 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 SFCT or one of its trusts, 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 [<insert link>](#).

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, subscribe to a service, apply for a grant, a bursary or other service, participate

in events, meetings and presentations, or social media functions linked to our site, or when you report a problem with our site.

Information processed following an enquiry from you

We process the following information:

- Your name (first and last),
- Organisation name,
- Organisation address,
- Your job title,
- Organisation telephone number,
- Organisation email address,
- Dietary requirements, where this is required for event catering,
- Photographs and video recordings at one of our events.

We use your name, organisation address, email address and phone number to contact you about your enquiry.

Information we obtain from other sources

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

- Public information sources, such as your organisation website, LinkedIn, news articles and public registers, such as The Charity Commission.
- People who think that you may be interested in supporting our trusts.
- 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 one of our Trusts.

Cookies & CCTV

We use cookies on our website (<http://www.sfct.org.uk>) to store information about how you use our website. A cookie is a piece of data stored on the user's computer tied to information about the visitor. 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 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 location.

To learn more about cookies and what you can do to opt out of receiving them, please view our Cookies Notice [<insert link>](#). Our website contains links to other websites. This privacy notice only applies to this website, so please read the privacy notices provided by the other websites before posting any personal information.

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 offices.

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. Note in relation to grant enquires, applications and awards, refer to the corresponding trust privacy notice:

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.
Sending you information such as newsletters, research reports, insights and other SFCT news and information which may be of interest.	When you agree to be contacted for marketing, we will rely on your consent, which may be withdrawn at any time by emailing dataprotection@sfct.org.uk .
Processing relevant personal information about existing and potential trustee and committee members and directors 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, and, in the case of charitable companies, the Companies Act 1985, 1989, and 2006.

For managing invitations to, attendance and catering at award ceremonies, events, or other presentations to which you are invited.	It is our legitimate interest to send invitations to individuals with an interest in the event we are holding. Where the event is catered, it is our legitimate interest to process personal dietary information to ensure that your food preferences are met and / or to protect your vital interests. We rely upon your explicit consent to process your personal dietary information which can be withdrawn at any time by emailing dataprotection@sfct.org.uk.
For recording our award ceremonies, events, or other presentations to promote the achievements of the Sainsbury family trusts and the work that we do.	It is our legitimate interest to take photos, videos and other recordings of the event we are holding to publicise the work of the Sainsbury family charitable trusts. We rely upon your explicit consent to take photos, videos or other recordings which can be withdrawn at any time by emailing dataprotection@sfct.org.uk.
For planning, mobilising, implementing and completing service contracts or supply agreements with third party suppliers (consultants, researchers, advisors, reviews and contactors).	This is necessary for the performance of the contract or services agreement we have entered with you. It is our legal obligation to process your contact details if you visit or undertake contracted work at our offices for health and safety purposes.
For organisational management, forecasting and statistical purposes.	It is our legitimate interest to identify areas for managing current relationships, developing new services, and for managing our organisation and our trusts.

For the purposes of inviting you to participate in one of our surveys and undertake analysis. Survey results will be aggregated before being shared or published.	Our legal basis for using the personal information in a survey is legitimate interest.
Improving our website and the overall website visitor and user experience.	It is our legitimate interest to process analytical data and statistical analysis to help improve and optimise our website. We use cookies on our website with your consent.

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 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. 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, Inland Revenue, local councils or the police for the prevention and detection of crime or other competent authorities with investigations including criminal and safeguarding investigations. The legal basis in these cases is compliance with a legal obligation.
- 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.

INTERNATIONAL TRANSFERS

SFCT only operates in the UK, however some of our trusts have interests in the EEA and outside the EEA. Please refer to the corresponding trust privacy notice for further details.

SFCT works with many 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 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 SFCT.

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.

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. Where CCTV is operational, we retain recordings for no less than 28 days and no more than 31 days on a rolling basis.

CONTACT US

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

Data Protection Manager
Sainsbury Family Charitable Trusts
The Peak,
5 Wilton Road,
London SW1V 1AP

Or you can email us at 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.

Last updated: 127 September 2023.