## **Privacy Notice**

The William Syson Foundation is committed to protecting and respecting your privacy. This Privacy Notice and any other documents referred to in it set out the way we process your personal information and to make you aware of how we use your data.

Any updates to our processes will be amended within this notice so that you can be confident when sharing information with us that we will only use it in the ways described here.

The William Syson Foundation ("the Foundation") is the Data Controller and Processor of your personal data, and as such is subject to the General Data Protection Regulation ("the GDPR"). The Foundation is registered with the UK Information Commissioner's Office with registration number ZA567081

You have the right to withdraw your consent to our processing of your personal information at any time, unless processing of your personal information is required in order for us to fulfil our obligations to you.

This notice was last updated in: May 2021

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## What is 'personal information'?

'Personal information' means any information that we hold, or are likely to hold, relating to an identified or identifiable living individual. In practice this means personal information we hold about applicants (including any representatives of applicants) for and recipients (including any representatives of recipients) of funding granted by us, and other individuals who we may communicate with in the course of fulfilling our objectives.

### Information we may collect from you

We may collect the following types of personal data about you:

- Assessment Data includes information that enables us to assess grant applications, including age, educational history, and personal description
- Contact Data, includes your e-mail address, telephone numbers and postal address, and records of communications and interactions we may have had with you
- **Identity Data** includes first name, last name, title, and date of birth.
- **Financial Data** includes information that enables us pay grant applications including bank and sort code details and records of our financial transactions with you.
- Cookie Data: includes IP addresses and information derived from IP addresses such as
  geographic location, cookie IDs on your browser, information about your device, such as
  browser, device type, operating system and other technology on the devices you use to access
  and navigate to our website
- **Special category data:** if you are a guest at event organised by the Foundation where we are serving food, we will collect information from you about your dietary requirements/preferences and any food allergies you may have.

## How we collect your personal information

We may collect and process certain personal information about you in various ways, such as:

- Directly from you when you fill in an application form for a grant award
- Whenever you contact us or we contact you directly with a question or comment
- When you interact with us in various other ways (for example attending events)
- Through the use of cookies on our website

## Why we collect your personal information

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We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data.

Personal Data (other than Special Categories of Personal Data – see below)

Purpose / Activity	Type of Data (excluding Special Categories of Personal Data)	Lawful basis for processing
Registering you as a new applicant	Contact Data, Identity Data	Legitimate interest (registering applications received)
Assessing grant application	Assessment Data, Contact Data, Identity Data	Legitimate interest (assessing eligibility of grant applicants)
Processing your grant, including managing payments	Contact Data, Identity Data and Financial Data	Legitimate interest (to provide you with your grant)
Managing our relationship with you which will include:  - Notifying you about the progress of your grant application - Communicating with you	Contact Data, Identity Data	Legitimate interest (to provide you with updates on your grant)
Organising and inviting you to events, and following up with you if you have attended our events	Contact Data, Identity Data	Legitimate interests (related to meeting our charitable objectives)

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To optimise your use of our website	Cookie Data	Legitimate interests (optimising use of our website)

#### Special Categories of Personal Data

Purpose / Activity	Type of Data	Lawful basis for processing
Details of special dietary requirements or	Health data	Legitimate interests (related to
food allergies because you have been invited		meeting our charitable
to a Foundation event where food is being		objectives)
served		
		Consent
		Vital interests

#### How we use it

Personal information provided to us will be used for the purposes outlined at the time of collection or application. Personal data collected and processed by us may be used for the following purposes:

- Assessment of grant applications
- Other activities relating to the fulfilment of our objectives

The William Syson Foundation does not carry out marketing activities. You will only receive what we would describe as essential communications to fulfil our obligations to you.

## **Sharing your personal information**

We will not share your information with any other organisations or individuals.

Your personal data is stored within the United Kingdom.

## **Storing information**

#### **Transmission of information**

We do our best to protect your personal information, but unfortunately the transmission of information over the internet or via the post is not completely secure. The transmission of your information to us is at

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your own risk. Once we are in receipt of your personal information we use strict procedures and security features to try to prevent unauthorised access.

Grant applications and other communications are received via email. Where required, for example as part of the grant assessment process, they are circulated via cloud storage to Trustees for consideration. Any paper copies are destroyed when no longer required.

#### How information is stored

Paper files are kept in lockable storage. Electronic files are stored on password-protected Foundation hardware (including backup storage) with appropriate security software, and/or on appropriately secure 'cloud' storage.

### How long information is kept for

We hold your information for only as long as necessary for each purpose that it is used:

- Grant applications may be kept for up to six years after your last interaction with us (for accounting and record-keeping purposes and requirements)
- Special category data (for example dietary preferences and allergies) will be kept until after the event and then deleted/destroyed

Details offered solely for communication will be held until you choose to opt out of communication. Should you opt out, your detail is erased from our databases with immediate effect.

#### **Destroying personal data**

Personal data is confidentially destroyed at the end of the relevant retention period.

#### **Cookies**

A cookie is a small file which is placed onto your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, and to provide information to the owners of the website.

We use first-party cookies on our website. We do not use third-party cookies. If you give us permission to use cookies any personal information collected by those cookies will be processed in accordance with this Privacy Notice.

Cookies on this website are used for:

• Strictly necessary purposes: these are required for the operation of our website.

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- Analytical/performance purposes: this allows us to recognise and calculate the number of
  visitors and to see how visitors navigate around the website when they are using it, which helps
  us improve the way our website works.
- **Sharing purposes**: this allows you to share pages with social networks such as Facebook and Twitter.

#### Links to other websites

From time to time, our website may contain links to websites operated by third parties. Please note that if you follow one of these links you will leave our website and this Privacy Notice will no longer apply. We are not responsible for the protection of information which you may disclose while visiting such third party websites.

## **Changes to our Privacy Notice**

We will update this Privacy Notice from time to time to make sure that it stays up to date with how we use your personal data and to meet any new legal requirements. The current version will be posted on this page of our website.

We recommend that you regularly check the Website for updates or changes made to this Privacy Notice.

## Your rights

You have the right to request a copy of the information we hold about you, free of charge.

You have the right to <u>withdraw your consent</u> to the practices described in this notice at any time, unless processing your personal information is required in order for us to fulfil our obligations to you, for example under a funding agreement.

You have the right to ask the Foundation (and, if the data has been shared, the Trust) to <u>update</u> your personal information if it becomes inaccurate.

You have the right to ask us to <u>transfer</u> the data we have collected to another data controller of your choice, or directly to you, under certain conditions.

You have the right to ask us to <u>erase</u> your personal information if:

• you withdraw your consent to our processing of your personal data; or

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- your personal data have been processed unlawfully by us; or
- your personal data are no longer necessary for the purposes for which it was collected by us.

We do not have to comply with a request to erase your personal data if we need to use that personal data for statistical purposes or as may otherwise be permitted by law.

You have the right to <u>restrict</u> our processing of your personal data if:

- you contest the accuracy of the personal data held by us (for a period enabling us to verify the accuracy of the data);
- our processing activities are unlawful; or
- we no longer need your personal data but you would like us to retain it to ensure its continued availability to you in connection with any legal claims.

In each case listed above, we will only process your personal data with your consent or as otherwise permitted by law.

You can contact us at any time in writing at the address below. We will respond as soon as possible, and within one month of receiving your request.

### **Governing Law**

This Privacy Notice and any dispute or claim arising out of or in connection with it or its subject matter or formation (including non-contractual disputes or claims) shall be governed and construed in accordance with Scots Law.

The courts of Scotland will have exclusive jurisdiction over any claim arising from, or related to, our Privacy Notice.

## **Contact and complaints**

If you have any queries about this Privacy Notice or how we process your personal information, or if you wish to exercise any of your rights under applicable law, you may contact our Data Controller at:

Email: hello@williamsysonfoundation.org.uk

Post: 5 Atholl Crescent, Edinburgh EH3 8EJ

If you believe our processing of your personal information does not comply with data protection law, you can find out more about your rights and make a complaint to the Information Commissioner's Office (ICO) using the following details:

Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL

Tel: 0303 123 1115

Email: scotland@ico.org.uk

Web: https://ico.org.uk/about-the-ico/who-we-are/scotland-office/