



# DATA PRIVACY POLICY

The Hinchley Charitable Trust (HCT) is committed to safeguarding the privacy of applicants and beneficiaries, and website visitors; this privacy statement sets out how personal information will be treated and the rights in relation to the personal data held.

The Hinchley Charitable Trust (a company incorporated in England and Wales with company number 5353283, and registered charity number 1108412) is the data controller of the relevant personal data and is subject to the General Data Protection Regulation (the “GDPR”) with effect from 25 May 2018. These regulations have been retained in UK law as UK GDPR post-Brexit, with no significant changes.

## PERSONAL DATA COLLECTION

HCT may collect, store and use the following kinds of personal information:

1. information provided for the purpose of enquiring about or applying for a grant;
2. information provided for the purpose of reporting on grants or providing case studies;
3. information provided for the purpose of applying for an employment role;
4. from third parties, for example partner organisations, in order to verify details about an applicant or application for an award, or to administer a grant once awarded;
5. when there is communication by telephone, email, other video-conferencing platforms or via the website;
6. any other information that applicants or beneficiaries choose to send to HCT
7. information about the user’s computer and about their visits to and use of this website (which may include an IP address, geographical location, browser type and version, referral source, entry page, exit page, length of visit, number of page views, route taken through this website, and similar information). This information is collected for the purpose of improving HCT’s website and communications.

## USING PERSONAL DATA

Personal information submitted to HCT via the website, directly via email or post, over the telephone, in person or by any other means will be used for the purposes specified in this privacy statement or in relevant parts of the website. HCT may process personal data for the reasons detailed below:

**Grant applicants:** Personal information provided to HCT via the website or directly via email or post for the purpose of submitting a grant application will be used as appropriate to complete a thorough assessment of the proposal. By sending information to the HCT email, including personal data, this assumes consent to the collection and retention of any information provided on the database. This data may be used to send email notifications related to a grant application.

An archive is maintained with records of previous grants and previously supported beneficiaries.

Information provided by beneficiaries for the purpose of reporting or case studies, will not be shared outside the organisation without explicit and informed consent.

**Job applicants:** Personal data submitted for the purpose of applying for an employment role at HCT will be retained for as long as needed to use it for the purpose of considering employment. If employment is not offered, the details are held on file for up to 6 months before securely destroying the data.

**Website users:** The Website uses cookies – please see the Cookies policy for further details. This data will be used to enable use of the services available on the website and improve browsing experience.

**Other:** Any other personal information knowingly provided, including but not limited to the purpose of contracting with HCT, will only be used for the purpose for which it was given. The data will not be kept for longer than necessary and will be destroyed securely. Personal information will not be shared with third parties unless it is required by law, for example, for the detection or prevention of crime.

## JUSTIFICATION

This information is processed according to Article 6 of the General Data Protection Regulation for the following reasons:

1. as necessary for the performance of tasks carried out in the public interest, in this case the disbursement of funds to a variety of charitable organisations who meet HCT's charitable objects;
2. as necessary in the pursuit of the legitimate interests of the charity, in this case, to acquire the information necessary to process grant applications
3. for compliance with legal obligations, in this case to provide full and accurate information to the Charity Commission and Companies House concerning the Directors of the Trust.
4. to monitor and evaluate the performance and effectiveness of HCT's awards.
5. It may be necessary to use personal data for the prevention and detection of crime, or to assist with investigations carried out by relevant authorities.

## **RETENTION PERIOD**

HCT reserves the right to hold data related to grant applications for archive purposes, to help inform future grant making policy/processes, and in order to facilitate a high standard of due diligence which will enable the charity to continue to fulfil its charitable objects. HCT reserves the right to hold data relating to unsuccessful enquiries or unsuccessful grant applications for 3 years, at which time they will be destroyed, except that a record of the applicant's name and proposal is retained indefinitely in HCT's archive.

## **PERSONAL DATA SECURITY**

HCT will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information.

HCT will store all the personal data provided on password protected cloud storage, and an external protected hard drive.

## **DISCLOSURES**

HCT may disclose information to any HCT employees, Trustees, or agents insofar as reasonably necessary for the purposes as set out in this privacy statement. HCT currently reserves the right to pass information provided to HCT by applicants to other Trusts and Foundations.

In addition, HCT may disclose personal information:

1. to the extent that HCT is required to do so by law;
2. in connection with any legal proceedings or prospective legal proceedings;
3. in order to establish, exercise or defend HCT's legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
4. to any person who HCT reasonably believes may apply to a court or other competent authority for disclosure of that personal information where, in HCT's reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy statement, HCT will not disclose information to third parties.

## **RIGHTS**

If HCT is instructed to provide any personal information held by HCT, provision of such information will be subject to the supply of appropriate evidence of identity.

In some circumstances the enquirer may have the right to:

- Request that any personal data held about them is erased, rectified if the enquirer thinks it is inaccurate, or updated if it is incomplete;
- Restrict processing of personal data (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
- Data portability (i.e. to request the transfer of personal data to a third party); and
- Object to HCT's processing of personal data.

Requests in respect of the above should be made in writing to the Hinchley Charitable Trust at 2 Arnold Drive, Chessington KT9 2GD. Please contact HCT at the same address if there is any reason to believe that information held by HCT is inaccurate. HCT will aim to respond to the request within one month from the date of receiving the request. Please note that HCT may, where legally permitted, reject any such request or limit the scope of HCT's response (for example if, in the circumstances, the right does not apply).

Generally, a fee will not have to be paid to exercise any of the rights described above. However, HCT may charge a reasonable fee if a request is made to see a copy of personal

information which is clearly unfounded or excessive. Alternatively, HCT may refuse to comply with a request in such circumstances.

If there are concerns about how HCT uses data, the enquirer has a right to complain to the Information Commissioner's Office.

## **PRIVACY STATEMENT UPDATE**

HCT may update this privacy statement from time-to-time by posting a link to the new version on the website. This page should be checked occasionally for any changes.

HCT may also send notification of changes to HCT's privacy statement by email.

## **OTHER WEBSITES**

The website may contain links to other websites that are not under the control of and are not maintained by HCT. HCT is not responsible for the content or reliability of the linked websites. HCT provides these links for users' convenience only but does not endorse the material on these sites.

## **CONTACT US**

If there are any questions about this privacy statement or HCT's treatment of personal information, please write by email to [info@hinchleycharitabletrust.org.uk](mailto:info@hinchleycharitabletrust.org.uk) or by post to 2 Arnold Drive, Chessington KT9 2GD.

*Revision Feb 2022, approved by the HCT Trustees on 11<sup>th</sup> June 2022*