

## Privacy Notice

This is the privacy notice of The Sir John Sedley Educational Foundation (Charity Number 527884)

Our registered office is at 11 Severn Close, Oakham, Rutland, LE15 6AY.

### Contents

|   |   |
|---|---|
| Introduction .....  | 2 |
| Data Protection Officer.....  | 2 |
| Personal Data We Process .....  | 2 |
| 1. How we obtain personal data .....  | 2 |
| 2. Types of personal data we collect directly .....                               | 2 |
| 3. Types of personal data we collect from third parties .....                     | 3 |
| 4. Types of personal data we collect from your use of our services .....          | 3 |
| 5. Our use of aggregated information .....  | 3 |
| 6. Special personal data .....  | 4 |
| 7. If you do not provide personal data we need .....                              | 4 |
| 8. Information we process because we have a contractual obligation with you ..... | 4 |
| 9. Information we process with your consent .....                                 | 5 |
| 10. Information we process for the purposes of legitimate interests .....         | 5 |
| 11. Information we process because we have a legal obligation .....               | 6 |
| 12. Information we process to protect vital interests .....                       | 6 |
| How and When We Process Your Personal Data .....                                  | 6 |
| 13. Your personal data is not shared .....  | 6 |
| 14. Information you provide .....   | 6 |
| 15. Payment information .....   | 7 |
| 17. Job application and employment.....   | 7 |
| 18. Information obtained from third parties.....                                  | 7 |
| 19. Third party advertising on our website .....                                  | 7 |
| 20. Service providers and business partners.....                                  | 7 |
| 21. Cookies .....   | 8 |
| 22. Personal identifiers from your browsing activity.....                         | 8 |
| 23. Re-marketing .....  | 9 |
| Other Matters .....   | 9 |
| 24. Your rights .....   | 9 |
| 25. Use of our services by children.....  | 9 |
| 26. Data may be processed outside the UK .....                                    | 9 |
| 27. Control over your own information .....                                       | 9 |

|     |                                    |    |
|-----|------------------------------------|----|
| 28. | Communicating with us.....         | 10 |
| 29. | Complaining.....                   | 10 |
| 30. | Retention period.....              | 11 |
| 31. | Compliance with the law.....       | 11 |
| 32. | Review of this privacy policy..... | 11 |

## Introduction

This notice describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, ‘personal data’ is information that clearly identifies you as an individual or which could be used to identify you if combined with other information. Acting in any way on personal data is referred to as ‘processing’.

This notice applies to personal data collected through our website and through social media platforms, email and via the post, including [www.sirjohnsedley.org.uk](http://www.sirjohnsedley.org.uk), Facebook and Instagram.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through any medium.

## Data Protection Officer

We have appointed a data protection officer (‘DPO’) who is responsible for ensuring that our privacy policy is followed.

If you have any questions about how we process your personal data, including any requests to exercise your legal rights, please contact our DPO, Charlotte Colton at [clerk@sirjohnsedley.org.uk](mailto:clerk@sirjohnsedley.org.uk)

## Personal Data We Process

### 1. How we obtain personal data

The information we process about you includes information:

- you have directly provided to us;
- that has been passed to us through a third party for Grant Aid purposes (for example, a parent or teacher).

### 2. Types of personal data we collect directly

When you use our website, or apply directly for our services, we ask you to provide personal data. This can be categorised into the following groups:

- personal identifiers, such as your first and last names, your title and your date of birth
- contact information, such as your email address, your telephone number and your postal addresses for billing, delivery and communication
- payment information, such as bank account details

- records of communication between us including messages sent through our website, email messages and telephone conversations
- marketing preferences that tell us what types of marketing you would like to receive

In addition, we may also process:

- documentation that confirms your identity, such as an image of your passport or driver's licence
- an image that shows your face, such as a passport photograph
- documentation that confirms the qualifications you advertise as holding
- documentation that confirms your employment, such as recent payslips
- documentation that confirms your address, such as a tenancy agreement or rental contract

### 3. Types of personal data we collect from third parties

We confirm some of the information you provide to us directly using data from other sources, such as your school or university. We also add to the information we hold about you, sometimes to remove the need for you to provide it to us and sometimes in order to be able to assess your application.

The additional information we collect can be categorised as follows:

- information that confirms your identity;
- information confirming your attendance to a school, university or course;
- information that confirms your contact information;

### 4. Types of personal data we collect from your use of our services

By using our website and our services, we process:

- information you contribute, including reviews or comments on social media;
- your replies to polls and surveys;
- usage information, including the frequency you use our services, the pages of our website that you visit, whether you receive messages from us and whether you reply to those messages
- transaction information that includes the details of the payments we have made to you, or refunds you have paid back to us.
- your preferences to receive marketing from us; how you wish to communicate with us; and responses and actions in relation to your use of our services.

### 5. Our use of aggregated information

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

## 6. Special personal data

Special personal data is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

It also includes information about criminal convictions and offences.

We do not collect any special personal data about you.

## 7. If you do not provide personal data we need

Where we need to collect personal data by law, or under the terms of a grant aid request we have, and you fail to provide that data when requested, we may not be able to provide funding. If so, we will notify you of this at the time.

### **The bases on which we process information about you:**

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## 8. Information we process because we have a contractual obligation with you

When you apply for grant funding, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal data.

We may use it in order to:

- verify your identity to ensure you meet the grant aid criteria
- provide you with our services
- provide you with suggestions and advice on services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. Ordinarily, the contract ends upon receipt of your funding and your follow up confirmation of your course being sent.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## 9. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our charity and services, you provide your consent to us to process information that may be personal data.

Wherever possible, we aim to obtain your explicit consent to process this information.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates (for example other charities) whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing Charlotte Colton ([clerk@sirjohnsedley.org.uk](mailto:clerk@sirjohnsedley.org.uk)). However, if you do so, you may not be able to use our services further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

## 10. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means;
- whether processing (or not processing) might cause you harm;
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- improving our services;
- record-keeping for the proper and necessary administration of our charity;
- responding to unsolicited communication from you to which we believe you would expect a response;
- preventing fraudulent use of our services;
- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property;
- insuring against or obtaining professional advice that is required to manage organisational risk;
- protecting your interests where we believe we have a duty to do so;

### 11. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal data.

### 12. Information we process to protect vital interests

In situations where processing personal information is necessary to protect someone's life, where consent is unable to be given and where other lawful bases are not appropriate, we may process personal information on the basis of vital interests.

For example, we may inform relevant organisations if we have a safeguarding concern about a vulnerable person.

## How and When We Process Your Personal Data

### 13. Your personal data is not shared

We do not share or disclose to a third party, any information collected through our website, social media, via email, via post or via telephone conversations.

### 14. Information you provide

Information is usually requested for grant applications directly from the applicant via email, telephone or in writing, including your name, course details and bank details. These details will be stored on an encrypted hardware device until your application has been concluded and finds have been paid or the application has been rejected.

Our website also allows you to post information with a view to that information being read, copied, downloaded, or used by other people, for example via our contact us form. When you leave a review or post a message on our website or social media platforms, we reasonably assume that you consent for the message to be seen by others. Your message may contain information that is personal data.

Other examples include:

- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal data in this way, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal data that you have posted. You can make a request by contacting us at [clerk@sirjohnsedley.org.uk](mailto:clerk@sirjohnsedley.org.uk)

## 15. Payment information

We store information about your bank details when you first provide it to us. This is so we can pay your grant aid.

We store this payment information until all funds have been paid. Ordinarily this will be for a very short space of time, until the funds have left our bank account. In the case of bursaries, which are paid over a 3-5 year period, details will be requested prior to each transaction.

We take the following measures to protect your payment information:

- We keep your payment information encrypted on our servers.
- Access to your payment information is restricted to authorised staff only.
- If we ask you questions about your payment information, we only show [partial detail, so that you can identify the means of payment to which we refer.

We automatically delete your payment information as soon as a transaction has been completed.

## 17. Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

## 18. Information obtained from third parties

Although we do not disclose your personal data to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal data from third parties, such as schools or parents.

This information may be personally identifiable to you.

## 19. Third party advertising on our website

We do not permit third party advertising on our website. In respect of social media, our comments are moderated to prevent any suspicious accounts viewing our followers' information.

## 20. Service providers and business partners

We may share your personal data with businesses that provide services to us, or with business partners.

As examples:

- we may use fraud prevention agencies and credit reference agencies to verify your identity and we may pass your information to those agencies if we strongly suspect fraud;
- we pass your details onto other Charitable Trusts who may be able to assist your needs, with your consent.

## 21. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you may not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to record your answers to surveys and questionnaires on our site while you complete them

## 22. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

### 23. Re-marketing

Re-marketing involves placing a 'tracking technology' such as a cookie, a 'web beacon' (also known as an 'action tag' or a 'single-pixel GIF') to track which pages you visit and to serve you relevant adverts for our services when you visit some other website.

The benefit of re-marketing technology is that we can provide you with more useful and relevant adverts, and not show you ones repeatedly that you may have already seen.

We may use a third-party advertising service to provide us with re-marketing services from time to time. If you have consented to our use of such tracking technologies, you may see advertisements for our products and services on other websites.

We do not provide your personal data to advertisers or to third-party re-marketing service providers.

## Other Matters

### 24. Your rights

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

### 25. Use of our services by children

We provide financial grants for young people and children aged under 25, so some of our marketing is directed to towards children and scholastic institutions.

Our whole website and social media pages are designed for use by children (over 15 years of age in the case of social media).

If you are under 18, you may use our website only with consent from a parent or guardian.

We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.

### 26. Data may be processed outside the UK

Our websites are hosted by Go Daddy, which is based in the USA. Whilst we do not actively share any data outside of the UK, data from our website and social media pages may be processed by these platforms.

### 27. Control over your own information

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes.

At any time, you may contact us to request that we provide you with the personal data we hold about you.

At any time you may review or update personally identifiable information that we hold about you, by contacting [clerk@sirjohnsedley.org.uk](mailto:clerk@sirjohnsedley.org.uk)

When we receive any request to access, edit or delete personal data we first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Please be aware that we are not obliged by law to provide you with all personal data we hold about you, and that if we do provide you with information, the law allows us to charge for such provision if doing so incurs costs for us. After receiving your request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

If you wish us to remove personally identifiable information, you should contact us to make your request.

This may limit the service we can provide to you.

We remind you that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

## 28. Communicating with us

When you contact us, whether by telephone, through our website or by email or post, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our organisation.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

## 29. Complaining

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us. Please address all complaints to Charlotte Colton on [clerk@sirjohnsedley.org.uk](mailto:clerk@sirjohnsedley.org.uk)

When we receive a complaint, we record the information you have given to us on the basis of consent. We use that information to resolve your complaint.

We aim to investigate all complaints relating to our services. However, we may not be able to do so as soon as a complaint is made. We endeavour to acknowledge all complaints within 5 working days and fully respond to all complaints within 8 weeks.

If your complaint reasonably requires us to notify some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at

<https://ico.org.uk/make-a-complaint/> . We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

### 30. Retention period

Except as otherwise mentioned in this privacy notice, we keep your personal data only for as long as required by us:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by our tax authorities
- to support a claim or defence in court

### 31. Compliance with the law

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

### 32. Review of this privacy policy

We shall update this privacy notice from time to time as necessary.