

Privacy notice: grant-funding applications

We respect your privacy and we are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you:

- apply for a grant; or
- otherwise assist us in the work that we do.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through your use of the grant application form on this website and otherwise in your interactions with us. This notice explains your privacy rights and how the law protects you.

Controller

‘We’ are the charity which you select as the charity you are applying to or otherwise in a funding arrangement with, via our online application form, from the list below. All of these charities are grant-making foundations, registered with the Charities Commission in England & Wales, and the number in brackets is their charity registration number.

Group A – these charities have the same trustees

Merchant Taylors’ Consolidated Charities for the Infirm (214266)

Henry Colborn (or Colbron) (310961)

The Merchant Taylors’ Company Charities Fund (1069124)

The Marler Trust (working name: The Merchant Taylors’ Foundation) (1094923)

Group B

The Merchant Taylors’ Company Education Fund (1161568)

Group C

Dudley and Geoffrey Cox Charitable Trust (277761)

If you have any questions about this policy, you can contact us by emailing data@merchant-taylors.co.uk

Changes to the privacy notice and your duty to inform us of changes

This version of our privacy policy was last updated on 11 November 2019. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. The data we collect about you

Personal data, or personal information, means any information about an individual where it is possible for the individual to be identified. It does not include data where it is not possible to tell which individual it relates to (anonymous data). We collect only that personal data from you which we need in order to operate as a grant-making foundation in the way that you would anticipate.

If you are acting on behalf of an organisation applying for a grant

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Contact Data	includes first name, last name and email address, telephone number, organisation address of you and other identifiable staff or identifiable trustees you have mentioned or whom we come in contact with for the purposes set out below under 'Purposes for which we will use your personal data'
Communications Data	includes emails, notes of conversations, and records of conversations

If you are an adult applying on your own behalf, or on behalf of a family member who is a child

When you apply directly to us, we ask for certain personal information about you and, if your application is on behalf of a family member who is a child, about that person so that we can work out whether or not we can provide grant funding. We also use this information to establish the long-term impact of grant-giving and to identify any gaps in our service provision. If your application is successful, we use this information to administer the grant and to record and monitor the benefits that our charity is able to provide to you/your family member. We also keep records relating to unsuccessful applications.

This is the type of information we might collect from you:

Your Contact Data	name, address, email address, telephone number
Other Relevant Data	reasons for the application your Financial situation your national insurance number (as an anti-fraud precaution) your bank account details (so we know where to pay any grant to) <i>The following extra information about any child family member to whom the application relates:</i> their date of birth any personal data about them set out in the reasons for the application
Communications Data	includes emails, notes of conversations, and records of conversations

Sensitive Data (if you would like to give us this)	This includes information about you or about any child family member to which the application relates, which you have supplied, about health and well-being, racial or ethnic background or criminal convictions.
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As regards any Sensitive Data, we will only collect this from you or in relation to your child family member if you or that child respectively wishes us to have the information to support your application. You can ask us to stop processing your Sensitive Data by contacting us at any time.

If you don't provide personal data

We may not be able to review or properly process your application if you don't want us to have certain personal information.

3. How is your personal data collected?

You may give us your personal data by submitting information on our website through our online application portal or by corresponding with us by phone, post, email or otherwise. This includes personal data you provide when you:

- enquire about our charity;
- apply for a grant from us;
- liaise with us in respect of such grant.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: 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. Our most common legitimate interest in using your data is to enable us to make grants in a way which furthers our grant-making objectives, with appropriate safeguards against fraudulent applications.

This includes but is not limited to considering the grant application, processing the grant to the beneficiary, and following up on how the grant has been used.

For users of our website: 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.

5. Purposes for which we will use your personal data

We have set out below, in a table format, 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 ground depending on the specific purpose for which we are using your data. Please contact us at data@merchant-taylors.co.uk if you need

details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To review a grant application and communicate with you	(a) Contact (b) Communications (c) Other Relevant (d) Sensitive	(a)-(c) –Necessary for our legitimate interests (to administer grants) (d) – Consent, which is given by you and by any child family member to whom your application relates, when you click the ‘Accept’ link in order to access the online grant application form
To manage our relationship with you	(a) Contact (b) Communications	Necessary for our legitimate interests (to tailor our charity offerings appropriately, to keep our records updated and to monitor how our charitable activities are operating and the impact they have).
To manage the public relations of the Merchant Taylors’ Company, which provides all of the trustees for the charities in Group A at paragraph 1 of this privacy notice.	(a) Contact (b) Communications	Necessary for our legitimate interests (to help members of the Merchant Taylors’ Company and the general public understand how the Company supports charities by providing trustees for grant-making foundations, and the impact which those grant-making foundations have).

6. Disclosures of your personal data

At some point, we might need to show your personal information to other charities, managed by the Merchant Taylors’ Company through its subsidiary company Bradestrete Services Limited, who are interested in working with the charity to which you have applied for funding, in order to pursue their charitable objectives. This may include for the purposes of seeking supplementary or alternative funding for your application from these organisations.

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

- Bradestrete Services Limited, which administers all of our charities. If one or more of our charities chooses to use a different charity administration service, that new service may use your personal data in the same way as set out in this privacy notice
- Third party IT service providers (including email service providers like Mailchimp online survey providers and cloud service providers like Salesforce or Microsoft)
- Third parties to whom we may choose to transfer, or merge parts of our charity or our assets. Alternatively, we may seek to acquire other charities or merge with them. If a change happens to our charity, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

Our internal operating system is cloud based and the servers may be located outside the EEA. We have an arrangement whereby we ensure a similar degree of protection is afforded to all data on this system by ensuring that:

- EITHER we have contractual obligations in place with our cloud service provider which requires them to give personal data the same protection it has in Europe. 4
- OR: the cloud service provider is based in the US and is part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will we use your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or regulatory reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see section below on 'Your legal rights'. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. In that case it ceases to be personal data and we may use this information indefinitely without further notice to you.

10. Your legal rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns about data protection before you approach the ICO so please contact us first via data@merchant-tailors.co.uk

You also have the right in certain circumstances to:

Request access to your personal data (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 correction of the personal data that we hold about you.	This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
Request erasure of your 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 your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request

	of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.	In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Request restriction of processing of your personal data.	This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
Request the transfer of your personal data to you or to a third party.	We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

To exercise the rights in the above table

You must notify us by email via data@merchant-tailors.co.uk.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Any other questions?

If you have any other questions about your personal data rights that are not explained here, please feel free to contact us at data@merchant-tailors.co.uk. You will also find further information about your personal data rights at the ICO website (www.ico.org.uk).