

PRIVACY POLICY – APPLICANTS

1. WHO ARE WE?

We are Marshall's Charity. Our registered address is 66 Newcomen Street, London, SE1 1YT and our charity number is 206780.

2. WHAT IS THIS POLICY?

This policy sets out what Personal Data we collect from you and what we do with it.

“Personal Data” means data which can be used to identify an individual (the “**data subject**”) and includes information about that individual.

If you have any questions relating to how we use Personal Data about you, please contact us at the address above or by email at grantoffice@marshalls.org.uk.

3. WHAT INFORMATION DO WE COLLECT AND STORE?

We may collect and process the following data about you, some of which may include Personal Data:

INFORMATION WHICH YOU PROVIDE US WITH WHEN YOU MAKE A GRANT APPLICATION OR CONTACT US: This may include:

- *your name, address and phone number*
- *online contact information*
- *your job position and your employer*
- *the name, address, phone number, online contact information, job position of others associated with a grant application e.g. the rector, church warden etc.*

4. HOW DO WE USE THE DATA WE COLLECT ABOUT YOU?

- i. PROCESSING GRANT APPLICATION. We may store the data we collect about you for administration reasons for the purpose of processing your grant application.
- ii. INTERNAL BUSINESS REQUIREMENTS: we may use your Personal Data in accordance with our internal business requirements. For example, we may need to retain back-up copies of data to make sure we have adequate safeguards in place to prevent loss of the data we hold; we may need to use your data to resolve disputes. We may also collect your Personal Data to enable us to provide you with information and support relating to the grant programme you have applied to, to provide a more personalised service to you, to provide feedback to you about your application or to notify you of new funding opportunities within our programmes. In this instance, we are relying on the fact that such use is to protect a legitimate interest to enable us to run our charity successfully.

- iii. **STATISTICAL ANALYSIS:** we may use aggregate data relating to your involvement in a programme for market research, statistical analysis and programme improvement purposes. This data will be pseudonymised and you will not be identifiable from it.

5. WILL PERSONAL DATA ABOUT YOU BE DISCLOSED TO ANYONE ELSE?

- i. We may disclose your Personal Data to third parties for the following purposes:

To our licensors, employees and third parties who are contracted to provide services to us to help our business. This will include Fluent Technology Ltd, which provides the Flexi-grant software you may use to make your grant application.

Any employees and/or data processors contracted by us will be subject to strict contractual requirements only to use your personal data in accordance with our instructions.

In the event that we sell or buy any business or assets. **We will never sell your Personal Data as a sole asset;** and/or

If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the operation of our website, or the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- ii. We may disclose aggregate data to third parties for analysis. Any data so disclosed will not contain Personal Data or commercially sensitive information by which your organisation could be identified.

6. WHAT SECURITY PROCEDURES DO WE HAVE IN PLACE?

It is our policy to ensure that all Personal Data held by us is handled correctly and appropriately according to the nature of the information, the risk associated with mishandling the data, including the damage that could be caused to an individual as a result of loss, corruption and/or accidental disclosure of any such data, and in accordance with any applicable legal requirements.

We undertake regular security and risk reviews and we monitor all of the controls that we have in place to ensure the security, accuracy and integrity of the Personal Data we hold. We also endeavour to ensure that such data is only accessed by authorised personnel for a legitimate purpose (in accordance with our privacy policy).

We have a set of formal procedures that must be adhered to within our organisation to ensure that security standards are maintained and that data privacy is respected. These include our Data Protection Policy and our Policy on Retention and Disposal of Personal Data.

7. WHERE DO WE STORE THE PERSONAL DATA WE COLLECT?

We are based in the UK and will hold Personal Data in that territory. Currently our servers are based in the UK.

By agreeing to our privacy policy you are agreeing to the transfer of Personal Data about you in accordance with the above.

8. FOR HOW LONG DO WE STORE PERSONAL DATA ABOUT YOU?

We will retain Personal Data about you for the duration of the grant application process. We may also retain information relating to your grant application for a period of 6 years after the transaction. This means that we can rely on the data if there is ever a dispute between you and us about a transaction. It also is important for us for tax purposes.

9. WHAT RIGHTS DO YOU HAVE IN RESPECT OF ANY PERSONAL DATA WE HOLD ABOUT YOU?

You have the following rights in respect of any Personal Data we hold about you:

- **Right of access:** you have the right to request a copy of the information which we hold about you.
- **Right of rectification:** you have the right to require us to correct any data which we hold about you which is inaccurate or incomplete.
- **Right to be forgotten:** in certain circumstances you can ask for the data we hold about you to be erased from our records. For example, if you have objected to our use of your data, and your interests outweigh our legitimate right to retain the data. This right is not an absolute right and data protection law also contains exemptions. If an exemption applies, we can either fully or partly refuse to comply with your request. For example, we can refuse to comply with your objection if we have a legitimate reason to continue processing your data that overrides your objection or if we are in a dispute with you and need to retain the data to defend our case.
- **Right to request the restriction or suppression of personal data:** This is not an absolute right and only applies in certain circumstances. When processing is restricted, Marshall's are permitted to store the personal data, but not use it.
- **Right of portability:** you have the right to have the data we hold about you transferred to another organisation.
- **Right to object:** you have the right to object to certain types of processing, **including direct marketing.**
- **Right to object to automated processing, including profiling.**

We may need to ask you for further information and identification to help us to comply with this request.

10. WHAT HAPPENS IF YOU WITHDRAW YOUR CONSENT TO US PROCESSING PERSONAL DATA ABOUT YOU?

You may notify us at any time that you no longer want us to process Personal Data about you for particular purposes or for any purposes whatsoever. This may have an impact on the services you receive from us. For example:

- If you restrict us from processing any data about you, we may not be able to keep your account open and you may not be able to progress with your grant application.

Please feel free to ask us about the impact of restricting our use of Personal Data.

11. LAWFUL BASIS

Marshall's collects personal data under the lawful basis of consent

12. WHO DO YOU COMPLAIN TO IF YOU'RE NOT HAPPY WITH HOW WE PROCESS YOUR PERSONAL DATA?

If you have any questions or concerns about how we are using Personal Data about you, please contact the Clerk to the Governors immediately at our registered address (see clause 1.1 above) or by email to The Clerk to the Trustees clerk@marshalls.org.uk.

If you wish to make a complaint about how we have handled Personal Data about you, you may lodge a complaint with the Information Commissioner's Office by following this link: <https://ico.org.uk/concerns/>.