



PRIVACY NOTICE

THE GATSBY CHARITABLE FOUNDATION

Last updated: 22 June 2023

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PRIVACY NOTICE

INTRODUCTION

The Gatsby Charitable Foundation (“Gatsby/we/us/our”) is one of 17 different independent, grant-making trusts established by members of five generations of the Sainsbury family.

Gatsby has funded charitable research initiatives and organisations that operate in many important sectors in the UK and overseas. Our current strategy focuses upon six areas:

- Plant science
- Neuroscience
- Education
- Africa
- Public Policy
- Arts

Gatsby has developed a framework of grant-making which enables it to make positive change today, tomorrow and in the future. This is done through small grants and funding advice to local initiatives, multi-year grants to build sustainable organisations, and long-term investments in world-class research centres and towards advocacy and policy change. Our funding streams are by invitation and, on rare occasions, unsolicited proposals.

We share offices located at The Peak, 5 Wilton Road, London SW1V 1AP with other trusts which are operated by the Sainsbury Family Charitable Trusts.

Keeping your personal information safe is very important to us. We are registered as a data controller with the Information Commissioner’s Office. Our registration number is Z6144160. Gatsby is committed to the protection of your personal data we process in line with the data protection laws applicable to the UK (namely the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018.

Gatsby operates and funds several separate charitable projects and programmes. This privacy notice applies to the following organisations which are under our control:

- Gatsby Technical Education Projects (Companies House registration number 03289238, ICO registration number Z9561174)



For grant administration and other personal data processing associated with Gatsby Africa please refer to their [privacy notice](#).

We have policies, procedures, and training in place to help our employees and volunteers understand their data protection responsibilities and our data protection principles. We have a nominated member of staff who serves as our Data Protection Manager. If you have any questions regarding how we collect, store and process your personal data, please email dataprotection@sfct.org.uk. We have also appointed an independent Data Protection Officer at data protection consultants, Evalian Limited who can be contacted by email at dpo@evalian.co.uk.

This privacy notice explains what personal data we collect from individuals who visit our offices or contact us by email, phone, or apply for a grant or send us other communications (“you/your”).

We place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. Gatsby is committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

If you have applied for a job with us or another Sainsbury trust, other than to Gatsby Africa, or submitted your CV (or similar employment information) to us, we process your personal data as set out in our [privacy notice for recruitment candidates](#).

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices or other services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

WHAT INFORMATION DO WE PROCESS?

Information we gather about you from public records and independent research

In fulfilling our grant making objectives we undertake our own research and identify practitioners, peers and specialists in their fields in specific topics of interest to the Trustees. We will process information about you that is available from public sources, generally limited to:

- Name (first and last)
- Organisation name and address (if any)
- Email address
- Telephone number
- Specialisms or areas of interest.

Information you provide to us

We process all information you give us, either through corresponding with us by post, telephone, email or otherwise or when you respond to our invitation to apply for a grant, to become an independent advisor or consultant, a co-funder, partner organisations, a contractor, a panel member or a peer reviewer, or submit a proposal. This may include:

- Name (first and last)
- Employer, Company or Institutional name and address
- Email address
- Telephone number
- Specialisms or areas of interest
- Message (web form)
- CV (including Home Address, Date of Birth, Education, Work history).

If you are awarded a grant

We already hold personal information from the application stage, but we may now collect the following additional information:

- Bank details to award and administer the grant
- Grant spend information
- Annual and end of grant information
- Information relating to post-award issues such as requests for supplements or extensions
- Information collected (e.g., project progress) during or after completion of the award.

Information processed by us when you subscribe to receive updates or information from Gatsby (e.g., newsletter from Gatsby Education).

We process the following information you give us when you submit a web subscription form to us.

- Name (first and last)
- Email address
- Employer, Company or Institutional name and address
- Company telephone number
- Message
- Area of interest.

Information processed by us when you participate in visits or activities that are funded, organised, or facilitated by Gatsby.

We process the following information you give us when you participate in a visit:

- Name (first and last)
- Email address
- Position / Job title
- Employer, Company or Institutional name and address
- Company telephone number
- Passport details (for flight bookings, visas and logistical support)
- Personal telephone number
- Date of Birth
- Next of Kin and emergency contact
- Allergies
- Dietary requirements
- Images, photographs, or recordings of the visits and activities.

Information processed by us when you accept an invitation to attend one of our Gatsby-organised events.

Events could be award ceremonies, other celebratory occasions, workshops on a particular topic, meetings of grant holders and other stakeholders, etc. We process the following information:

- Name (first and last)

- Email address
- Position / Job title
- Professional affiliation (employer, company or institution you represent)
- Company telephone number
- Personal telephone number
- Dietary requirements
- Images, photographs, or recordings of the event.

Information we may obtain from other sources.

Indirectly, we may record or receive additional details about you from:

- Public information sources, such as your website, Facebook page, LinkedIn page, Twitter handle, or from news articles and public registers, such as The Charity Commission.
- People who think that you may be interested in applying for a grant.
- External sources such as publications and works, external reviewers or advisers when you apply for or are awarded a grant from us.

Cookies & CCTV

We use a limited number of cookies to analyse traffic to our websites:

- <https://gatsby.org.uk/>
- <http://www.gtep.co.uk/>

This also includes the Gatsby Education websites:

- <https://www.improvingtechnicaleducation.org.uk/>
- <https://www.technicians.org.uk/>
- <https://www.goodcareerguidance.org.uk/>

Cookies are small text files that are downloaded to your device when you visit a website, unless you have set your browser to reject them.

We use cookies to remember your preferences, display content that is more relevant to you and improve your overall experience of our site. To learn more about cookies and what you can do to opt out of receiving them, please view our [Cookies Notice](#). Our website contains links to other websites, such as LinkedIn and Twitter. This privacy notice only applies to this

website, so please read the privacy notices provided by the other websites before posting any personal information.

To ensure the safety of all our visitors, contractors and staff, SFCT and the Landlord's property managers capture and record CCTV images at the main entrances to our office buildings.

PURPOSES AND BASES FOR PROCESSING YOUR DATA

We will only use your personal information for the purpose that it was provided to us and in ways that you would reasonably expect. We may use your data for the following purposes and on the following lawful bases:

| Purpose | Lawful Bases for Processing |
|---|---|
| Responding to correspondence from you or other type of enquiry. | It is in our legitimate interest to respond to enquiries made by phone, by email, through our social channels or any other means. |
| For assessing the suitability of your grant application. | When you submit a grant application or proposal to us, we are processing it with your consent, which may be withdrawn at any time by emailing dataprotection@sfct.org.uk . |
| Sending you information such as newsletters, research reports, insights and other news about Gatsby Foundation activities and information which may be of interest. | When you agree to be contacted for general or specific (e.g., careers newsletter) information about the Foundation, we will rely on your consent, which may be withdrawn at any time by emailing dataprotection@sfct.org.uk . |
| For managing the grant-making process and fulfilment of our obligations, as set out in our grant awards, or other contractual agreements. | This is necessary for the performance of the grant award or other agreement we have entered with you. |
| For running networking events for people associated with Gatsby funding (e.g., the Gatsby Plant Science Network) | It is in our legitimate interest to encourage and support networks of grantees and associated individuals to maximise the impact of our charitable funding. If you do |

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| | not wish to be included in our networking communications, please email dataprotection@sfct.org.uk . |
| For charitable foundation management, forecasting and statistical purposes. | It is our legitimate interest to identify areas for improving charitable relationships, developing new award opportunities and managing the charitable foundation. |
| Processing relevant personal information about trustees and committee members of the grant recipients / award beneficiaries for governance purposes. | It is our legal obligation to comply with governance requirements of the Charities Act 2011, Charities (Protection and Social Investment) Act 2016, and the Trustees Acts 1925, 2000. |
| Publicising the positive impact of the foundation e.g., by publishing case studies, reports, or marketing collateral. | Publication of your details, including photographs and recordings, is in our legitimate interest to publicise our activities or if you are uniquely identifiable we may do so with your consent which may be withdrawn at any time by emailing dataprotection@sfct.org.uk . |
| Publishing our annual reports, which may contain grant award case studies. | Publication of your details in our case studies is with your consent which may be withdrawn at any time by emailing dataprotection@sfct.org.uk . |
| For managing overseas travel arrangements for consultants, advisers or other individuals invited by Gatsby to take part in international visits, events, or activities. | Processing your personal details including passport, visa information, vaccination records, and other relevant health data is with your explicit consent which may be withdrawn at any time by emailing dataprotection@sfct.org.uk . |

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| <p>Invitation and attendance at our events.</p> | <p>It is our legitimate interest to publicise and celebrate the work of the foundation by holding charitable events.</p> <p>If you attend a catered event, we will collect and use information you provide about dietary requirements with your consent</p> <p>We may collect and use photographs and recordings with your consent, which may be withdrawn at any time by emailing dataprotection@sfct.org.uk.</p> |
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SHARING YOUR INFORMATION

We will not sell or exchange your personal information. We will only share your personal information where we are required to fulfil our grant award or agreement with you, or other legitimate interest, where we have your consent, or we are required to do so by law. This may involve the participation of other collaborative partners, such as co-funders, funding partners or project partners outside of the Sainsbury Family Charitable Trusts. For grants applications, personal information may also be shared with external expert reviewers who support the assessment of applications. Gatsby works closely with other Sainsbury Family Charitable Trusts and may share personal details with the other trustees and trust staff, but only if it helps support your needs.

We may share your personal information with third party organisations who will process it on our behalf. This is strictly governed by data processing terms which confirms that the personal information we provide will only be used for the purposes we specify and will be processed in line with data protection legislation.

Other third parties we may share your personal data with include:

- Public bodies such as the UK Charity Commission, Inland Revenue, or the police. The legal basis in these cases is compliance with our legal obligations.
- In case of an emergency, we may also share your information with the relevant public health and emergency services and contact your next of kin. The legal basis for processing in such cases is to protect your vital interests.

We are committed to transparency and publish a report annually about the foundation's activities. Where appropriate we publicise a list of our grants on the 360 Giving website (<https://www.threesixtygiving.org/>). Our annual reports may contain personal data (names, employers, and activity details) as part of the case studies about the grants awarded to publicise the positive impact of the foundation.

INTERNATIONAL TRANSFERS

Gatsby works with several organisations, advisers and suppliers (such as Gatsby Africa) and it is possible that we will share your data with other third-parties that process your data in countries outside the EEA where the data protection laws are not equivalent to those within the EEA. Where international transfers applies, we do so, either based on an 'adequacy decision' or using Standard Contractual Clauses approved by the European Commission and recognised by the UK which contractually oblige companies in those countries to meet the same standard expected within the EEA. More information about these is available [here](#).

HOW DOES GATSBY PROTECT PERSONAL DATA?

Gatsby takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of the data.

YOUR RIGHTS

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (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 rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format ("data portability").

- Request erasure of 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 personal data where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g., if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of Gatsby.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject.

If at any time you decide that you no longer wish to be contacted for marketing purposes, or if you would like to exercise any of your rights as set out above, you can contact us by email. See 'Contact Us'.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

DATA RETENTION PERIOD

We will retain your personal data for as long as it necessary for the purpose of our relationship or until you object to us processing it or withdraw your consent. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance or audit purposes.

CONTACT US



You can contact Gatsby in relation to data protection and this privacy notice by writing to:

Data Protection Manager
The Gatsby Charitable Foundation
c/o Sainsbury Charitable Family Trusts
The Peak
5 Wilton Road
London SW1V 1AP

Alternatively, you can email us at dataprotection@sfct.org.uk