

PRIVACY NOTICE

THE GATSBY CHARITABLE FOUNDATION

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PRIVACY NOTICE

INTRODUCTION

The Gatsby Charitable Foundation (“Gatsby/we/us/our”) is one of 20 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 principles set out in the UK General Data Protection Regulation (“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 here](#).

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 [here](#).

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 bottom 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:

- Your name (first and last)
- Organisation name and address (if any)
- Your email address
- Your telephone number
- Your 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,

- Your name (first and last)
- Employer or Institutional name and address
- Your email address
- Your telephone number
- Your specialisms or areas of interest
- Message (web form)
- CV (including Home Address, DoB, 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 second)
- Email address
- Employer / Company name
- Company address
- Company phone number
- Message
- Area of interest

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

- Name (First and second)
- Email address
- Position
- Company name and address
- Company phone number
- Passport details (for flight bookings, visas and logistical support)
- Personal phone number
- Date of Birth
- Emergency contact
- Allergies

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:

- Your name (first and last)
- Your professional affiliation (employer or institution you represent)
- Position
- Your email address

- Your phone number
- Your dietary requirements

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 advisors when you apply for or are awarded a grant from us.

Cookies & CCTV

We use a limited number of cookies on our websites to analyse traffic to the site.

- <https://gatsby.org.uk/>

<http://www.gtep.co.uk/>

Gatsby Education websites.

- <https://www.improvingtechnicaleducation.org.uk/>
- <https://www.technicians.org.uk/>
- <https://www.goodcareerguidance.org.uk/>
- <http://www.technicaleducationnetworks.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 which it was provided to us for 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 trust, 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 charitable trust 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 trust.
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, the Trustees Acts 1925, 2000.
Publicising the positive impact of the trust e.g. by publishing case studies, reports, or marketing collateral	Publication of your details, including photographs and recordings is 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 .
Invitation and attendance at our events.	<p>It is our legitimate interest to publicise and celebrate the work of the trust 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>

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 agreement with you, or 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. 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 trust'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 trust.

INTERNATIONAL TRANSFERS

Gatsby operates primarily in the UK, but also supports charitable organisations that operate in Africa. These are managed by Gatsby Africa. Where personal data is shared between Gatsby Foundation and the branches and institutions of Gatsby Africa, we do so on the basis of data sharing agreements which contractually oblige these organisations to meet the same standard expected within the UK.

Gatsby works with several advisors and suppliers and it is possible that we will share your data with other third-party suppliers that process your data in countries outside the UK where the data protection laws are not equivalent to those within the UK. Where this applies, we do so, either based on an 'adequacy decision' or documented in an International Data Transfer Agreement (IDTA) approved by the UK Information Commissioner's Office (ICO) which contractually oblige companies in those countries to meet the same standard expected within the UK. More information about these is available [here](#).

YOUR RIGHTS

The UK 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

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