

## **The Holbeck Charitable Trust Privacy and Cookies Policy**

### **1. Introduction**

The Holbeck Charitable Trust (a company limited by guarantee) (“we”, “us”, “our”) operate this Privacy and Cookies Policy because we are committed to safeguarding the privacy of those who submit grant applications to us and of those who use our website (www.holbecktrust.com), and the confidentiality of any personal data that we collect about individuals.

This Privacy and Cookies Policy sets out how we will use any personal data that we may obtain from individuals (including personal data submitted by grant applicants).

Whenever you submit your information to us, whether it be by using our website, by email, by post, over the telephone, in person or by any other means, we will collect and use of such information in accordance with the terms of this Privacy and Cookies Policy.

We are committed to ensuring that all personal data we hold is treated properly and in accordance with applicable data protection legislation (which includes the General Data Protection Regulation and the Data Protection Act 2018). We are registered as a controller with the Information Commissioner’s Office (“ICO”) and our registration number is Z3195328.

In accordance with data protection legislation we are required to explain to you how we will treat any personal data which we collect from you.

### **2. What information do we collect and how do we use it?**

If you or your organisation apply for a grant (including but not limited to via our website, by post or by email), we will ask for certain information which may include personal details relating to the individual submitting the application (such as their name, job title, contact address, telephone number and email address) and relating to any other individuals relating to your organisation who are referred to in the application.

Applicants will also be asked to provide details of where they heard about us, previous applications to us, the reason why they are not a registered charity (if applicable), their organisation’s aims, related planned activity and the demand for such aims and activity, staff and volunteer numbers, geographical area of delivery, any similar organisations in the same geographic area, details regarding annual income, expenditure and administration costs, and details of what the funding applied for would be used for (including whether there would be any related shortfall and, if so, details of any additional funding and/or how the shortfall will be covered).

If you submit an application to us for a grant (including but not limited to via our website, by post or by email) we will use the information submitted in the application to assess your application, contact you in relation to the application and, should your application be successful, make a grant payment to you. By providing us with your information and signifying consent on the application form, you will be giving consent to us using any personal data contained within your application for the above purposes.

All personal data that you provide as part of your application will be managed centrally by us and/or our trust administrators Rollits LLP and the University of York and that information will be disclosed to our individual trustees as part of the application assessment process.

We will further use your information where necessary for our legitimate interests as follows:

- If you correspond with us using email, we may retain the content of your email messages together with your email address and our responses in order to manage your relationship with us;

- If you report a problem with our website, we may share the information that you provide us with our website developer;
- In dealing with any enquiries and requests that you sent to us;
- In responding to appeals or complaints;
- For our own audit and assurance purposes and our continuous desire to improve our services. For example, to prevent and detect fraud and misuse and to ensure that grant processing is carried out by our staff and trustees to a high standard and continuously improved; and
- For our own administrative purposes. For example, keeping our business systems and records up to date.

You warrant that any information you supply to us is accurate and up to date, that you will inform us if any such information requires updating, and that if you submit a third party's details to us (including any individual associated with your organisation) you have that third party's permission to do so and that you have made sure that such third party has read, and agrees to their personal data being used as described in this Privacy and Cookies Policy.

We do not sell or license personal data or information about applicant organisations to third parties. If we wish to use any personal data for any purpose not described in this Privacy and Cookies Policy, we will ensure that we have obtained the relevant individual's consent.

### **3. Third Parties**

As mentioned above, we will share personal data about individuals associated with grant applicants with our individual trustees for the purposes of assessing any grant application submitted by you. We will also share personal data:

- with third parties who provide us with professional advice or who are directly involved in any enquiry or grant application submitted by you (including our trust administrators Rollits LLP and the University of York);
- for insurance and auditing purposes;.
- where we are legally required to do so;
- where we are requested by the Charity Commission to do so;
- where we are required to enforce our Grant Application Guidelines;
- to protect our rights, property or the safety of our employees, trustees or others;
- where we have stated otherwise (e.g. on our website);
- in connection with criminal investigations, legal proceedings or prospective legal proceedings where necessary for our legitimate interests and permitted by law; and
- where necessary for our legitimate interests in establishing, exercising or defending our legal rights (including providing information to others for the purposes of fraud prevention) and permitted by law.

We may also disclose your personal data to third parties in the event that we sell or buy any assets (in which case we may disclose your personal data to the prospective seller or buyer of such assets) or if we or

substantially all of our assets are acquired by, merged with or amalgamated with a third party, in which case personal data held by us about our grant applicants will be one of the transferred assets.

If we provide you with a grant we may publicise our involvement with you in our annual Trustees' report and in other publications. We may also publish aggregated non-identifying information from time to time.

#### **4. Security**

We will take all reasonable steps to protect your personal data. However, the Internet is global and no data transmitted via the Internet can be guaranteed by us to be completely secure during transmission. We cannot guarantee the security of any data that you disclose to us (whether online, by email or otherwise) and we will not be responsible for any breach of security unless this is due to our negligence or wilful default. It is possible that the information you provide to us will be temporarily transferred via a route outside the European Economic Area as it passes between you and us.

#### **5. Your Rights**

You have a legal right to see a copy of the personal data that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:

- request that we erase any personal data about you;
- restrict our processing of your personal data (for example, to ask us to suspend the processing of personal data to establish its accuracy or the reasons for processing it);
- data portability (i.e. to request the transfer of personal data to a third party); and
- object to our processing of your personal data (for example, if we are processing it based on our legitimate interests).

Requests in respect of the above should be made in writing to the Data Compliance Officer, The Holbeck Charitable Trust, C/O Rollits LLP, Forsyth House, Alpha Court, Monks Cross, York, YO32 9WN.

In accordance with data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity before disclosing certain information to you.

Please contact our Data Compliance Officer at the above address if you have any reason to believe that any information we hold about you is inaccurate or if you have any queries, comments or requests regarding this Privacy and Cookies Policy or how we handle information about you and your organisation.

#### **6. Retention**

We only retain your personal data for as long as we need it for the purpose for which it was collected. Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time we retain your personal data; consider the purpose or purposes for which we hold your personal data in deciding whether (and for how long) to retain it; securely delete your personal data if it is no longer needed for such purpose or purpose; and update, archive or securely delete your personal data if it goes out of date. For further information on how long we retain personal data, please contact our Data Compliance Officer using the contact details set out in section 5 above.

#### **7. Cookies**

This website uses “cookies” to ensure you receive the best possible visitor experience. Cookies are small files which are sent by a web server to an individual’s computer which are then stored on that computer’s hard drive. A cookie contains text, and is like an identification card which can only be translated by the server it originated from.

Cookies cannot tell us information such as your email address, which we can only collect where you tell us, for example if you submit a grant application.

Our website uses the following cookies for the following purposes:

- **fn\_user:** this is an encrypted cookie (which cannot be read by a third party) that stores an ID number relating to the user that has logged in. Its purpose is to load the appropriate user information from our database on every page refresh by retrieving the ID number and thus prove that the user has logged in. No other personal information relating to the user is stored using this cookie; and
- **holbeck\_cp:** this is a very small cookie that stores a boolean (i.e. ‘yes’ or ‘no’) value that simply informs the website if you have viewed this Privacy and Cookies Policy.

Most internet browsers allow you to prevent cookies being stored on your computer. Alternatively you may be able to configure your browser to accept all cookies or to notify you when a cookie is offered by our server. You may also be able to delete all cookies currently stored on your web server. Unless you change your browser settings you will automatically accept cookies from this website.

We may also collect information about where you are on the Internet (e.g. the URL you came from, IP address, and domain types like .co.uk and .com), your browser type, the country where your computer is located, the pages of our website that were viewed during your visit and the date and time of your visit. We may collect this information even if you do not submit a grant application to us and will use it to administer our website, for internal operations (including troubleshooting, data analysis, testing, research, statistical and survey purposes) and as part of our efforts to keep our website safe and secure. All such information is collected on an aggregated basis and will not be associated with you as an individual.

For further information about cookies and how they are used, please visit [www.aboutcookies.org](http://www.aboutcookies.org).

## **8. How will you know if we make any changes to this Privacy and Cookies Policy?**

We may amend this Privacy and Cookies Policy from time to time. You are bound by any changes we make to this Privacy and Cookies Policy with effect from the date of the change. If we make any substantial changes to the way in which we use personal data submitted by you (including as part of a grant application) we will notify you by posting a notice on our website's homepage and you will ensure that all individuals to which such personal data relates are made aware of the change. You can view the current version of our Privacy and Cookies Policy at any time by clicking on the Privacy and Cookies Policy link on our website's homepage.

## **9. What about third party websites that you can access via our website?**

Our website contains links to other websites which are outside our control and are not covered by this Privacy and Cookies Policy. If you access other websites using the links provided, the operators of those websites may collect personal data from you which will be used in accordance with their respective privacy policies which you should read. We are not liable for the practices of such third party website operators in respect of your personal information.

## **10. Complaints**

If you have any concerns about the way we have used, shared or processed your personal data you have the right to lodge a complaint with the ICO. However, we would always appreciate the opportunity to address any concerns before you approach the ICO so please contact us using the details set out in section 5 in the first instance.