

Privacy Notice (updated May 2019)

The Data Protection Act 2018 (the **2018 Act**) places certain obligations on us to protect your personal data that we collect from you and only to process it for specified purposes.

For the purposes of the 2018 Act, the controller is Baron Davenport's Charity of 5/7 Temple Row West, Birmingham, B2 5NY with Registered Charity No. 217307 (**we, our, us**).

Baron Davenport's Charity is not incorporated and therefore its Trustees are collectively responsible for your personal data. Any reference to Baron Davenport's Charity in this Privacy Notice includes a reference to the Trustees of the Baron Davenport's Charity.

In this Privacy Notice **you** means the individual whose personal data is processed in accordance with this Privacy Notice including, without limitation, the Applicant or the Referring Body (as defined below), as required by the context.

When anyone asks us for a grant we have to collect personal information about:

- The person for whom an application for a grant is being made or who will be the beneficiary of the grant ("Applicant") and the circumstances surrounding the application in order to help our Trustees make a decision about whether to award that person the grant applied for; or
- Where it is a different person to the Applicant (Referring Body), the person who is making the application for a grant for the purpose of contacting that person about the application.

We are required under the 2018 Act to tell you the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Notice sets out the basis on which we will process your personal information.

For the avoidance of doubt, the terms of this Privacy Notice do not apply to data other than personal data, including, for example, data collected from you or provided by you about organisations.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting our website (www.barondavenportscharity.org) (**our website**) or by otherwise providing us with your personal data (either directly or through a Referring Body) you acknowledge that your personal information will be processed as described in this Privacy Notice.

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Grants offered

We award three types of grant:

- Grants to almshouses, hospices and residential homes for older people, organisations that support children and young people and organisations that support older people;
- Twice yearly grants to individuals who meet the criteria set out by us in our guidelines; and
- Emergency grants to individuals who meet the criteria set out by us in our guidelines.

As set out in our guidelines available on our website, except in respect of grants made to organisations, some paper applications can be made by the Applicant directly

however the majority of applications for a grant, including all applications for emergency grants and all applications made online will need to be made by a Referring Body on your behalf.

Where an application is made by a Referring Body, you are required to give that Referring Body your explicit consent to submit the personal data contained in that application on your behalf in order to enable us to process that personal data in accordance with that Privacy Notice.

If you do not agree with the terms of this Privacy Notice you must not make an application to us or otherwise provide us with your personal data.

Information that we collect from you or about you

We may collect and process the following personal data about you:

- **Information you give us.** You, or a Referring Body on your behalf and with your explicit consent, may give us information about you and any children you have by filling in forms on our website or by corresponding with us by phone, email, post, in person or otherwise. This includes information you provide when you register to use our website, submit an application (including any supporting statement) to us for a grant, make enquiries about your application or about Baron Davenport's Charity and when you report a problem with our website. The information you give us will depend on the type of grant applied for. We have set out below the information that we will require about the Applicant arising from the application for each type of grant and the information that we will require about the Referring Body making the application:
 - **Grants to organisations** – name, address, telephone numbers, email address and job title of the individual at the organisation making the application;
 - **Twice yearly grants** – name, address, email address, telephone numbers, date of birth, date of death of spouse, marital status, residency information, National Insurance number and financial information (including bank account details) about the Applicant. We may also require Special Category Personal Data about the Applicant (please see below); or
 - **Emergency grants** - name, address, date of birth, marital status, residency information, National Insurance number and financial information about the Applicant. We may also require Special Category Personal Data about the Applicant (please see below).
- In the event that a Referring Body makes an application on behalf of an individual, the Referring Body is also required to provide us with the name, address, telephone

numbers, email address and job title of that individual at the Referring Body making the application.

- **Special Category Personal Data.** The data that we request from you may include sensitive personal data. This includes information that relates to the mental or physical health and racial or ethnic origin of any Applicant (which may include children's data) (**Special Category Personal Data**). By submitting a grant application or otherwise providing us with Special Category Personal Data, you must ensure that you agree to, (or must ensure that you provide explicit consent to the Referring Body) for us to process that Special Category Personal Data for the purpose of dealing with the application and, where relevant, providing you or the applicant with the relevant assistance, in accordance with this Privacy Notice.
- 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. It is also important to note that if you do not provide us with the information we request then we may not be able to process your application or respond to your queries.

Cookies

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them [see our Cookie policy](#).

Why do we collect this information?

We process the Personal Data of Applicants and any children for whom a grant application is made for the following reasons:

- **Pursuant to a contract** in order to:
 - assess your grant application, manage or monitor any grant made as necessary for the performance of a contract between you and us or to take steps at your request before entering into such contract;
 - process grant payments; and
 - sending relevant and necessary communications regarding your application via phone, email or post. These will include notifications about the changes to our service.
- On the basis of your **consent**:
 - where we rely on your consent for processing this will be brought to your attention when the information is collected from you.

- In our **legitimate interests** of providing the best support and improving and growing our charity we will process information in order to:
 - provide you with information about your eligibility to apply for a grant and how to do so;
 - improve our services;
 - keep our site and systems safe and secure;
 - understand our Applicant base and needs;
 - defend against or exercise legal claims and investigate complaints; and
 - for use in anonymised aggregated publicity material to show how Baron Davenport’s Charity can assist others.

You have the right to object to processing carried out for our legitimate interests. See the **What are your rights?** section below for more information.

- To comply with **legal requirements** relating to:
 - the provision of our services;
 - Charities Acts and Companies Acts;
 - data protection;
 - health and safety;
 - anti-money laundering;
 - fraud investigations;
 - assisting law enforcement; and
 - any other legal obligations placed on us from time to time.

How long do we keep hold of your information?

- **Grant database.** For the twice yearly and emergency types of grant, we hold a database of personal information about Applicants and their Referring Body who have made applications for assistance. We hold this personal information for a period of six years from the end of Baron Davenport’s Charity’s financial year in which you cease to be a beneficiary.
- **Grants to organisations.** We hold a database of personal information about the individuals who have made applications on behalf of the organisation. We may hold this personal information for more than six years for statistical and historical research purposes.

For any other information, we will only keep it as long as is reasonable and necessary for the relevant activity.

Baron Davenport Charity’s approach to funding is built on the foundation of strong relationships, so we also keep personal information in the longer term (whether or not

an application is accepted or a grant is made) so that we have a clear record of our interaction with your organisation. This helps us to understand the way in which our relationship with your organisation has developed over the years.

Who might we share your information with?

For the purposes set out in the ‘Why do we collect this information?’ section above, we may share your personal information with the following categories of third parties, some of whom we appoint to provide services, including:

- Our partners, suppliers, and sub-contractors to enable us to process your application and provide you with a grant;
- Any third party that may be providing services to the Applicant or any other beneficiary of the grant (including related children) for example providing goods or services granted by the Trustees; and
- Our Trustees, including for the purpose of processing your application and making a decision about whether to award you a grant.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Baron Davenport’s Charity, our beneficiaries, our Trustees, or others.

This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

How is your data stored and kept secure?

Where you have provided your personal data in hard copy format, this will be stored:

- In a paper based, locked and secure filing system in our offices;
- On a secure cloud-based grant management system; and/or
- On our secure servers.

Where you have provided your personal data online, this will be stored:

- On a secure cloud-based grant management system; and/ or
- On our secure servers.

The personal information you provide to us may be transferred or stored in countries located outside of the European Economic Area (EEA). By way of example, if any of

our servers or those of our third party service providers are from time to time located in a country outside of the EEA or if our third party suppliers themselves send personal information out of the EEA.

If we (or our third party suppliers) transfer or store your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

Where we have given you an Applicant ID which enables you to access certain parts of our website and cloud-based grant management system, you are responsible for keeping this ID confidential. We ask you not to share this ID with anyone outside your organisation.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at enquiries@barondavenportcharity.org or writing to us at Baron Davenport's Charity, Portman House, 5/7 Temple Row West, Birmingham, B2 5NY. You have the right:

- To ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- To ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest;
- To request from us access to personal information held about you;
- To ask for the information we hold about you to be rectified if it is inaccurate or incomplete;

- To ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation or the data is children's data and was collected in relation to an offer of information society services;
- To ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing); and
- To ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here:

<https://ico.org.uk/concerns/>.

Changes to our Privacy Notice

Any changes we may make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Notice.

Contact us

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to us at Baron Davenport's Charity, Portman House, 5/7 Temple Row West, Birmingham, B2 5NY or emailing enquiries@barondavenportcharity.org.