**GDPR Privacy Policy**

1. Introduction
	1. We, the Weinstock Fund (with the '**Fund**', '**we**', '**our**' or '**us**' being interpreted accordingly) are committed to protecting your privacy and personal information. Personal information relating to you from which you can be identified that we collect or which you provide is called personal data (**'Personal Data**').
	2. This privacy policy ('**Privacy Policy**') tells you about the Personal Data we collect; how we handle or process such Personal Data and who we may share it with. This Privacy Policy also provides information on your legal rights in relation to your Personal Data.
2. Changes to this Privacy Policy
	1. From time to time we may change the way we use your Personal Data and amend this Privacy Policy. Please check that you have seen the latest version.
	2. If the changes to this Privacy Policy are significant and you are in receipt of an ongoing grant from the Fund we may inform you by letter or other communication.
3. What Personal Data do we collect and use?
	1. The Personal Data about you that we collect and use includes the following:
		1. your name, address, phone and other contact details;
		2. job role, responsibilities and employer; and
		3. any other Personal Data that you may provide to us from time to time.
4. How your Personal Data is collected
	1. We collect Personal Data about you in various ways as follows:
		1. through application forms submitted in request of grants; and
		2. through your relationship and any other communications you have with us with us from time to time.
5. Information about third parties
	1. Please ensure that any Personal Data you supply to us which relates to third party individuals is provided to us in a sufficiently anonymised form or otherwise with their knowledge of our proposed use of their Personal Data.
6. What we use your Personal Data for

Other than as stated above, we may use your Personal Data for one or more of the following purposes:

* + 1. to provide charitable grant-making for the benefit of the public;
		2. to keep and administer our records and accounts;
		3. to enforce and/or defend any of our legal claims or rights; and/or
		4. for any other purpose required by applicable law, regulation, the order of any court or regulatory authority.
1. The lawful grounds on which we collect and process your Personal Data
	1. We process your Personal Data for the above purposes relying on one or more of the following lawful grounds:
		1. where you have freely provided your specific, informed and unambiguous consent;
		2. where we need to use your Personal Data for legitimate purposes relevant to us being able to lawfully operate our charitable purposes. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and freedoms and in particular your right of privacy; and/or
		3. where we need to comply with a legal obligation or for the purpose of us being able to establish, exercise or defend legal claims.
2. Our Legal Obligations regarding your data
	1. We collect and process your Personal Data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ('**GDPR'**) and the UK Data Protection Act 2018 ('**DPA'**) together with other applicable UK and EU laws that regulate the collection, processing and privacy of your Personal Data (together, **'Data Protection Law**').
3. Disclosing your Personal Data to third parties
	1. We may need to disclose your Personal Data to certain third party organisations who are processing data only in accordance with our instructions under contract (called **'data processors'**) in the following circumstances:
		1. companies and/or organisations that act as our service providers or professional advisers; and
		2. companies and/or organisations that assist us in processing and/or otherwise fulfilling grant requests.
	2. We may also disclose your Personal Data to our regulators, including the Charity Commission, who make their own determination as to how they process your Personal Data and for what purpose(s) (called **'data controllers'**). The third party data controllers external to us with whom we deal as described above will handle your Personal Data in accordance with their own chosen procedures and you should check the relevant privacy policies of these companies or organisations to understand how they may use your Personal Data. Since they are acting outside of our control, we have no responsibility for the data processing practices of these data controllers.
	3. Other than as described above, we will treat your Personal Data as private and will not disclose your Personal Data to third parties without you knowing about it. The exceptions are:
		1. in relation to legal proceedings or where we are legally required to do so and cannot tell you;
		2. where we use third parties data processors who are engaged under contract to handle data on our behalf (for example an email provider)*.* In relation to these data processors, we will make sure that they act only in accordance with our instructions and that adequate safeguards are put in place by them to protect your Personal Data.
	4. In all cases we always aim to ensure that your Personal Data is only used by third parties for lawful purposes and in compliance applicable Data Protection Law.
4. International Transfers
	1. We do not transfer any of your Personal Data outside the United Kingdom.
5. How long we retain your Personal Data for
	1. The Fund only retains Personal Data identifying you for as long as you have a relationship with us; or as necessary to perform our obligations to you (or to enforce or defend contract claims); or as is required by applicable law.
	2. We have a data retention policy for the different periods we retain data for in respect of relevant purposes in accordance with our duties under Data Protection Law, which can be provided on request. The criteria we use for determining retention periods for your data is based on various legislative requirements; the purpose for which we hold data; and guidance issued by relevant regulatory authorities including but not limited to the UK Information Commissioner's Office (ICO).
	3. Personal Data we no longer need is securely disposed of and/or anonymised so you can no longer be identified from it.
6. Security that we use to protect Personal Data
	1. We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.
	2. We also endeavour to take all reasonable steps to protect Personal Data from external threats such as malicious software or hacking. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of all data sent to us (including Personal Data).
7. Your personal data rights
	1. In accordance with your legal rights under applicable law, you have a **'subject access request'** right under which you can request information about the Personal Data that we hold about you, what we use that Personal Data for and who it may be disclosed to as well as certain other information. Usually we will have a month to respond to such as subject access request. We reserve the right to verify your identity if you make such a subject access request and we may, in case of complex requests, require a further two months to respond. We may also justify refusal or charge for administrative time in dealing with any manifestly unreasonable or excessive requests for access. We may also require further information to locate the specific information you seek before we can respond in full and apply certain legal exemptions when responding to your request.
	2. Under Data Protection Law you also have the following rights, which are exercisable by making a request to us in writing:
		1. that we correct Personal Data that we hold about you which is inaccurate or incomplete;
		2. that we erase your Personal Data without undue delay if we no longer need to hold or process it;
		3. to object to any automated processing (if applicable) that we carry out in relation to your Personal Data, for example if we conduct any automated credit scoring;
		4. to object to our use of your Personal Data for direct marketing;
		5. to object and/or to restrict the use of your Personal Data for purpose other than those set out above unless we have a legitimate reason for continuing to use it; or
		6. that we transfer Personal Data to another party where the Personal Data has been collected with your consent or is being used to perform contact with you and is being carries out by automated means.
	3. All of these requests may be forwarded on to a third party provider who is involved in the processing of your Personal Data on our behalf.
	4. If you would like to exercise any of the rights set out above, please contact us at the address below.
	5. If you make a request and are not satisfied with our response, or believe that we are illegally processing your Personal Data, you have the right to complain to the Information Commissioner's Office (ICO) – see https://ico.org.uk/.
8. Contact

If you have any queries regarding this Privacy Policy or wish to make a further request relating to how we use your Personal Data as described above, please contact:

Sally Barber

The Weinstock Fund

PO Box 5369

Wincanton

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Email: enquiries@weinstockfund.org.uk

*Reviewed April 2023*