

# PRIVACY & COOKIES POLICY

We, The Ralph and Meriel Richardson Foundation are incorporated and registered in England and Wales with company registration no. 3674554 and our registered office is at 5 Stratford Place, London, W1C 1AX. We are also a registered charity and registered with the Charities Commission under number 1074030. We value all those with whom we are in contact and those who we help, and we respect their privacy.

We will comply with all relevant laws and regulations relating to data protection, whether local, national or supranational, including (i) the Privacy and Electronic Communications Regulations (EC Directive) 2003 (S/2003i2426) (ii) all applicable requirements of the General Data Protection Regulation ((EU) 2016/679) (the “GDPR”) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK unless and until the GDPR is no longer directly applicable in the UK and then (iii) any successor legislation to the GDPR and/or any national law.

This Privacy and Cookies Policy (the “Policy”), together with any other document(s) referred to in it, sets out how we will treat your personal information, and is intended to help you understand how we deal with any personal information we may obtain from you and how you may access, alter, rectify and/or remove it. Under data protection legislation we are the Data Controller and we are required to notify you of the information contained in this Policy. It is important that you read this Policy so that you are aware of how and why we are using such information.

This Policy only relates to the collection, protection, disclosure and use of personal data belonging to individuals who visit [www.sirralphrichardson.org.uk](http://www.sirralphrichardson.org.uk) (“our Site”) or who otherwise provide us with their personal information. We will use your information only for the purposes for which it was collected.

By providing your personal information to us, you understand and agree that we may collect and use it in the ways described in this Policy. If you do not agree with the terms of this Policy, please do not provide personal details to us.

Please note that we may need to update this Policy from time to time to reflect changes in the law. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. We recommend that you check this page

regularly to ensure that you have read the most recent version and are happy with any changes.

## **1. What information do we collect from you?**

1.1 It is your choice to provide us with personal information. Personal information (or 'personal data') means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

1.2 The information we may collect from you includes, but is not limited to:

1.2.1 personal contact details such as name, title, address, telephone number and email address, that you may provide to us by filling in forms on our Site, or if you communicate with us to request information or for any other reason, or when telephoning us;

1.2.2 detailed personal financial and health information that you furnish to us if you complete and send to us a formal Application for a Grant or other assistance

1.2.3 correspondence, or a record of it if you should contact us;

1.2.4 details of your visits to our Site (including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise) and the resources that you access;

1.3 It is important that the personal data we hold about you is accurate and current. Please advise us if your personal data changes during your relationship with us.

## **2. How do we collect your information?**

2.1 Ways in which you may be providing us with personal information include, for example:

2.1.1 By contacting us via our Site for any reason;

2.1.2 completing an Application Form for a Grant which contains very detailed personal information of a financial nature and may contained detailed information of a medical or health nature;

2.1.3 reporting a problem; and/or

2.1.4 making a donation.

### **3. How do we use your Personal Data?**

3.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

3.1.1 Where we need to deal with matters relating to your Application for a Grant;

3.1.2 Where we need, but only if we have your consent, to communicate with other charities, medical personnel, care homes, and any other third parties in furtherance of your Application for a Grant;

3.1.3 Where it is necessary for our legitimate interests, and when your interests and fundamental rights do not override those interests.

3.1.4 Where we need to comply with a legal or regulatory obligation.

### **4. Opting Out**

You can ask us to stop handling your personal information entirely or, to not disclose your personal information to third parties for whom you have previously given us permission, by sending an email to [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk)

### **5. IP Addresses and Cookies**

5.1 We may collect information about your computer or device, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

- 5.2 **Cookies.** A “cookie” is a small electronic file that collects information when someone visits a website. A cookie can identify the pages that are being viewed, and this can assist us to select the pages that the visitor sees. Some cookies only exist whilst visitors are online, but “persistent” cookies – which are not session-based – remain on the visitor’s computer or device, so that he or she can be recognised as a previous visitor when he or she next visits our website. Our Site does not have any ‘persistent’ cookies on it.
- 5.3 Any information that we acquire about you using cookies is subject to the same restrictions and conditions as any other information we collect about you.
- 5.4 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access our Site.

## **6. The Cookies Used on Our Site**

- 6.1 The only Cookies used on our Site are set by the company which hosts our Site and are as follows:

BIGipServerZebedee: - This is part of the back-end architecture of the hosting service that manages the Site and it belongs to the class of “load-balancing cookies”. Our Site is hosted on multiple servers and when you visit the Site, you are assigned to one of these servers for the current session. This cookie routes data and page requests to the correct server and so ensures that the content of the page loads quickly and effectively.

TS01237438: - This cookie is used to enforce security policy by the host servers. Both cookies are set to expire at the end of the session.

## **7. How to Disable/Enable Cookies**

- 7.1 You have the ability to accept or decline cookies by modifying the settings on your browser. For example, in Internet Explorer, you can go to Tools and then Internet Options, where there is the option to change your settings to disable

cookies. However, you may not be able to use some of the features of our Site if the cookies are disabled.

7.2 You also have the ability to delete cookies that may have been installed in the cookie folder of your browser. To do this, you should search for “cookies” in your Help function for information on where to find your cookies folder.

7.3 Unless you have adjusted your browser settings so that it will refuse cookies, our Site will issue cookies on visiting and browsing.

## **8. Change of Purpose**

8.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us by sending an email to us at [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk)

8.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

8.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **9. Why do we collect your information?**

9.1 We will only use personal information collected from you for the purpose it was collected (or for related purposes) or in the following circumstances:

9.1.1 Services – To provide specific services that you request.

9.1.2 Ease of Use – To ensure that content from our Site is presented in the most effective manner for you and for your computer or device.

9.1.3 Communication – To notify you about changes to information we place on our Site or our services.

9.1.4 Compliance – To comply with a legal duty or regulatory obligation to which we are subject.

9.1.5 Legitimate Interests – Where it is necessary for our legitimate interests, and when your interests and fundamental rights do not override those interests. Legitimate Interest means the interest of our charity in conducting and managing itself in a way which enables us to give you the most efficient assistance and service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

9.2 We will not, under any circumstances, sell your personal information to anyone else.

## **10. How do we store your information?**

10.1 All personal information we collect from you is stored on secure servers.

10.2 The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of technical support services. By submitting your personal information, you agree to this transfer, storing or processing. If your personal information is shared, you can expect a similar degree of protection in respect of your personal information as we require third parties to respect the security of your data and to take appropriate measures to protect your personal information in line with this Policy.

10.3 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 Site; any transmission is at your own risk. Once we have received your personal data, we will use procedures and security features to try to prevent unauthorised access.

## **11. How long do we keep your information?**

We will only retain your personal information for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and for the uses set out in this Policy. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **12. When might we disclose your personal information**

12.1 We may disclose your personal information:

12.1.1 To prepare or send any communications to you, or to assist us in connection with any of our administrative or business functions, or in the delivery and/or provision of any assistance or other services to you.

12.1.2 In the event that we dispose of our business, in which case we may disclose your personal data to the prospective transferee.

12.1.3 If our Foundation is acquired by a third party, in which case personal data held by us about our donors and our grantees will be one of the things transferred.

12.1.4 If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements we have entered into; or to protect the rights, property, or safety of our Foundation, our grantees, donors, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

12.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not permit our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **13. Data Security**

- 13.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to the Directors, Trustees, and members of the Foundation's Grants Committee from time to time who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 13.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **14. How can I access the information that you hold about me?**

Under the GDPR you have the right to access information we hold about you (commonly known as a "data subject access request") free of charge. If you would like a copy of this information, please email us at [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk)

#### **15. What if I don't want you to hold my information anymore?**

You have the right to ask us not to process your personal data at any time by contacting us at [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk)

#### **16. Can I change the information you hold about me?**

- 16.1 Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide assistance or services to you. We will advise you if this is the case at the time you withdraw your consent. To withdraw your consent, please contact us at [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk) Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 16.2 Under certain circumstances you also have the right to:

- 16.2.1 Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.
- 16.2.2 Request access to the personal information that we hold about you. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 16.2.3 Request erasure of your personal information where there is no good reason for us continuing to process it.
- 16.2.4 Object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 16.2.5 Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 16.2.6 Request the transfer of your personal information to you or a third party.

If you want to contact us with regards to the information we hold about you as above, please do so by emailing us at [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk) You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded,

repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

- 16.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **17. Time limit to respond to you**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.

## **18. How do I contact you?**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to [manager@sirralphrichardson.org.uk](mailto:manager@sirralphrichardson.org.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You may do this by email at <https://ico.org.uk/> or via their helpline + 44 (0)303 123 1113, or in writing to the Customer Contact, ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

**This Policy was last revised on 11 May 2018**