

# **Privacy Policy**

May 2023

## A. Rosetrees CIO - Privacy Policy

This privacy policy sets out how Rosetrees CIO, registered with the Charity Commission as Rosetrees with charity no. 1197546 ('the Charity'), processes personal data (that is, information about an individual or by which an individual can be identified) that we collect in the course of our lawful activities, in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation and any related or subsequent legislation or regulations (the 'Data Protections laws'). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we do with your data and agree to this. If you have any questions about this policy, you can call us on +44 (0)20 8951 2588 or write to us at <a href="info@rosetreescio.net">info@rosetreescio.net</a> or to The Data Protection Officer, Russell House, 140 High Street, Edgware, Middlesex HA8 7LW. In some cases, we may require that you submit your request in writing.

The Charity is the 'data controller' for the purposes of this policy, unless stated otherwise. The Charity is committed to ensuring that your privacy is protected and this policy extends to its staff, trustees, academic and professional advisors. Any personal data collected by the Charity will only be processed in accordance with this policy. References to the processing of information includes the collection, use, storage and protection of data.

Organisations are permitted to process data if they have a legal basis for doing so. The Charity processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed;
  and/or
- The Charity has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; and/or
- The Charity has a legal obligation to process data.

Where the Charity is relying on consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying the Charity in writing, although this may affect the extent to which the Charity is able to provide services to or interact with you.

The Charity may change this policy from time to time and any such changes will be published on our website. Notwithstanding any change to this policy, we will continue to process your personal data only in accordance this policy, our legal obligations and, where you have communicated them to us, your preferences.

This policy was last reviewed in May 2023.

#### B. What data do we collect?

We collect the data necessary for the Charity to pursue its charitable objectives, including that which enables us to consider applications for funding from the Charity, to administer grants and for the effective running of the Charity through its professional staff, trustees, academic and professional advisors. Data collected and processed may include, but not be limited to:

- Names, job titles, contact information such as telephone numbers, email and postal addresses;
- Information necessary to receive or make payments, whether to or from donors, grantees, staff or others;
- Information regarding grant applicants and those working for and with them and about their research, career and academic history and other details as are provided to the Charity through its application forms and otherwise, and as are relevant and necessary in order for the Charity to carry out its activities, charitable purposes and legal obligations;
- Such other information as may be relevant and necessary for the Charity to employ staff, work with volunteers and advisors, partner with other organisations, hold events, run its activities and promote and publicise its work.

We may collect data when you contact us, complete an application form or otherwise share data with us in the course of engagement with the Charity as an applicant for funding, employee, donor, academic adviser or otherwise, and we may also collect data from other publicly available sources in the legitimate furtherance of our charitable objects.

# C. What we do with the data we process

The Charity uses the data collected to maintain accurate internal records of applications and applicants to the Charity, of donors and donations and of staff and volunteers. These records facilitate our activities, including the processing and consideration of applications for funding, and the administration of funds granted. Data may be processed and viewed by staff, trustees, academic and professional advisors in the course of the Charity's activities (all of whom work in accordance with this privacy policy). We will only retain data for as long as is reasonable and necessary for the purposes for which the data was collected and in line with this policy, including:

- In the case of successful grant applications, for a period allowing for future reference, evaluation and review including, but not limited to, administration of any grant made and the future monitoring and analysis of grant expenditure, and for reference to ongoing agreements in respect of intellectual property and associated rights;
- In the case of unsuccessful applications, for a period of approximately two years, or such other period as may be deemed appropriate in the circumstances, in order to be able to consider amended or new applications from the same applicants within this time-frame.

You, as the data subject, may request deletion of your data at any time in writing, subject to any overriding legal basis or requirement for its retention by the Charity. We may also keep a limited amount of data on a suppression list to avoid unintentionally making unsolicited contact with you in future.

We will only share your data with trusted third-parties where necessary to meet our charitable objectives and in furtherance of our activities, and only once we are satisfied that they will protect the privacy and security of your data to the same high standard that we do in applying this policy. These might include funding partners, online or electronic payment platforms, cloud-based data storage systems and email communications platforms.

We may from time to time contact you by email, post, text or telephone to inform you about the activities of the Charity or related matters which we think may be of interest to you and, where required, only after requisite consents have been obtained. If you would rather we did not contact you, please let us know in writing.

#### D. Your rights in relation to your personal data

You may request details of personal information which we hold about you. A small fee may be payable if an information request is particularly onerous. Any such request must be submitted in writing and will be responded to in accordance with our legal obligations.

You may choose to restrict the collection or use of your personal information, but this may inhibit or limit the way in which the Charity is able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation on the Charity to retain data. We will not share your personal information with third parties, except as stated above, unless we have your express permission or are required by law to do so.

You are responsible for the accuracy of data you have provided to the Trust. If you believe that any information we hold about you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

You can obtain further information about Data Protection and privacy laws by visiting the Information Commissioner's website at: <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>.

## E. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data on behalf of the Trust do so in accordance with this policy and on the basis that the Trust is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent in this way. You are responsible for keeping any password or security information that you use for accessing our systems or services confidential; we will not ask you for your password (except when you log in to our systems or services).

#### F. Web browsing and Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. The file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

You can choose to accept or decline certain cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may use traffic log cookies to identify which pages are being used to help us analyse data about web page traffic and improve our website in order to tailor it to visitor needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type, together with certain anonymous statistical data about your browsing activities and patterns which does not contain any personal data.

#### G. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.