



Privacy Policy

Approval body:	Mulberry Schools Foundation Board
Implementation date:	October 2021
Last reviewed:	January 2024
Next review date:	January 2025
Policy version:	3

Version	Reviewed	Changes since last version
1	October 2021	Original
2	October 2022	No changes – part of an annual review
3	January 2024	Additions in line with ICO policy focusing on the processing of information. References to the processing of Trustee data added

Introduction

Mulberry Schools Foundation is committed to safeguarding the privacy of all those we engage with in pursuit of our charitable mission. Everyone has rights with regard to the way in which their personal data is handled. Personal data, which may be held on paper or digitally, is subject to legal safeguards specified in the Data Protection Act 2018 and UK GDPR.

During our activities, we will collect, store and process personal data about our Trustees, Friends, partners, donors, grant applicants, grant recipients, contractors and other third parties, and we are committed to the correct and lawful treatment of this data.

This Privacy Policy describes exactly how we collect and use your personal information. By contacting us, engaging with our activities, using our services or visiting our website you are agreeing to be bound by this Policy.

Mulberry Schools Foundation is registered with the Information Commissioner's Office as a data controller. If you have any queries about this policy, please contact info@mulberrychoolsfoundation.org.

Purpose of this policy

This policy sets out the basis on which Mulberry Schools Foundation ("the Foundation") will process any personal data we collect from you or that is provided to us by yourself or other sources. It sets out how we will meet the data protection rules and legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.

What is personal information?

Personal information/data includes information relating to natural persons who can be identified or who are identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information. This information may also include contact information and characteristics (e.g. name and contact details).

Personal data collection

Mulberry Schools Foundation may collect, store and use information that you provide to us for the purposes of:

- subscribing to email notifications and/or newsletters;
- enquiring about or registering to become a Friend of the Foundation;
- enquiring about or becoming a partner of the Foundation;
- making a donation to the Foundation;
- enquiring about or applying for a grant;
- reporting on grants or providing case studies;
- contracting with the Foundation having accepted a commission for services;
- applying for a volunteer or employment role;
- making general enquiries;
- improving our website and communications.

The Foundation may also receive personal information indirectly, such as from major donor databases, as part of prospect research.

Using personal data

Personal information submitted to us via our website, via email or post, over the telephone, in person or by any other means will be used for the purposes specified in this privacy statement. We may process your personal data as below.

a. **Becoming a Friend, partner or donor to the Foundation**

The Foundation maintains a database of those who have registered as a Friend, partner or donor. At the point of registration, you will be asked whether you wish to receive relevant communications from us. From time to time, we may also contact you to ask you to engage with new initiatives. You have the right to withdraw your consent from receiving our communications at any time. We will ask you on a regular basis to update your personal details used for communication.

The Foundation uses CAF Donate as a third-party provider of the platform for managing online donations to the Foundation. Their privacy policy applies and is available on their website.

b. **Trustees**

The Foundation maintains a register of interests for Trustees in order to uphold good governance and in accordance with statutory and government purposes. It also holds personal information about Trustees for contact purposes and to provide details to relevant bodies such as the Charity Commission and Companies House. Trustee information will be stored for up to three years after the end of a Trustee's term. Profiles about the Trustees are also displayed on the Foundation's website with Trustees' consent.

c. **Grant applicants**

Personal information provided to us via our website, or by email or post for the purpose of submitting a grant application will be used as appropriate to complete a thorough assessment of your proposal. By submitting the application form with your information, including personal data, you will be providing your explicit consent to the collection and retention on our database of any information you provide. We may use your data to send you email notifications related to a grant application and to send you general non-marketing communications. Your data will not be shared outside our organisation without your explicit and informed consent.

Information provided by grantees for the purpose of reporting or case studies, will be used as appropriate to inform the evaluation of the impact of the Foundation's activity. By submitting information for this purpose, you will be providing your explicit consent to the collection and retention on our database of any information you provide. Your data will not be shared outside our organisation without your explicit and informed consent.

d. **Volunteer or employment applicants**

Personal data submitted for the purpose of applying for a voluntary or employment role at the Foundation will be used for the purpose of considering you for a vacancy. If we determine that we cannot offer you the role, we will retain your details on file for up to 6 months before securely destroying the data.

e. **Website users**

The Foundation may collect information about your use of our website, to help improve its accessibility and our communication. This may include information about your computer and about your visits to and use of the website (for example your IP address, geographical location, browser type

and version, referral source, entry page, exit page, length of visit, number of page views, route taken through the website).

f. General enquiries

If you contact us via our website, telephone, email or post to make an enquiry, the information that you provide will be held as necessary for our legitimate interests in dealing with your enquiry and analysis of enquiries received.

Any other personal information knowingly provided to us, including but not limited to the purpose of contracting with us, will only be used for the purpose for which it was given. The data will not be kept for longer than necessary and will be destroyed securely. Your personal information will not be shared with third parties unless it is required by law, for example, for the detection or prevention of crime.

Data retention

We retain your personal data for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation, typically 6 years). In addition, personal data may be securely archived with restricted access (and other appropriate safeguards) where there is a need to continue to retain it.

The Foundation will retain data pertaining to registers of Friends, partners and donors and to email groups receiving Foundation newsletters, updates and invitations indefinitely. Members of these groups have the right to unsubscribe at any point and the process is indicated in each mailing. The data of those unsubscribing will be removed from Foundation records.

The Foundation reserves the right to hold data related to grant applications for archive purposes, to help inform future grant making policy/processes, and to facilitate a high standard of due diligence which will enable the charity to continue to fulfil its charitable objects.

The Foundation reserves the right to hold data related to unsuccessful volunteer or employment applications for no longer than 6 months, before all data is securely destroyed.

Financial records, including those of grant payments, will be retained for a minimum period of six years from the end of the financial year in which the payment was made, in order to comply with statutory obligations.

If you have consented to the processing of your information and the Foundation does not need to retain it for any of the above reasons, you are able to withdraw your consent at any time by contacting info@mulberryschoolsfoundation.org.

If consent has been withdrawn or the relevant time period for the retention of personal data has elapsed, any information will be securely destroyed.

Personal data security

Mulberry Schools Foundation will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide digitally to the Foundation is stored on our secure servers or on secure servers operated by a third party. This information is protected using both password management tools, data encryption and two-factor authentication where possible. 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 information, we will use strict procedures and security features to try to prevent unauthorised access.

All information you provide on paper or verbally to the Foundation will be stored securely in cabinets at our registered address, available only to appropriate staff and/or Trustees.

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Disclosures

We may disclose information about you to any of our Trustees, employees, officers, agents, suppliers or subcontractors insofar as is reasonably necessary for the purposes as set out in this privacy statement.

In addition, we may disclose your personal information:

- to the extent that we are required to do so by law;
- in connection with any legal proceedings or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
- to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy statement, we will not provide your information to third parties.

Cross-border data transfers

Information the Foundation collects is stored and processed in the UK. Personal information you submit for publication on the website will be published on the internet and may be available around the world.

Your rights

Under the Data Protection Laws your rights are:

- *To be informed* – We must make available this privacy notice with the emphasis on transparency over how we process your data.
- *Access* – You are entitled to find out what details we hold about you and why. Provision of such information will be subject to the supply of appropriate evidence of your identity.
- *Rectification* – We are obliged to correct or update your details.
- *Erasure* – This is also known as a request to be forgotten.
- *Restrict processing* – You have the right to ‘block’/suppress the processing by us of your personal data.
- *Data portability* – You have the right to obtain and reuse the personal data you have provided to us.
- *Object* – You have the right to object to us processing your data for direct marketing and/or profiling.
- *Automated individual decision-making* – You have the right to not be subject to a decision based solely on automated processing, including profiling, which has a significant effect on you.

Requests in respect of the above should be made in writing to info@mulberryschoolsfoundation.org. We may, where legally permitted, reject any such request, or limit the scope of our response (for example if, in the circumstances, the right does not apply to you).

If you have any concerns about our use of your personal information, you can make a complaint to us at info@mulberryschoolsfoundation.org. A full Complaints Policy is available on the Foundation’s website.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address is Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Helpline number: 0303 123 1113; ICO website: <https://www.ico.org.uk>.

Our social media presence

We have a presence on social media platforms such as Facebook and Twitter/X. These accounts are used to post information such as notices about our events and to promote the activities of the Foundation by reposting appropriate content.

Please be aware that any responses to our content on these platforms is done through your own choice, at your own risk and without expectation of privacy. We say this because we are not able to control how other users on these platforms may act. We are also not able to control how these platforms may use your personal data nor do we endorse how these services use personal data. We advise you to read the platforms' own privacy policies in advance of using their services.

Complaints

If you have any queries or concerns about how the Foundation uses your personal data, please contact info@mulberryschoolsfoundation.org in the first instance. Please ask to be referred to the Chair of Trustees if appropriate.

If your concerns persist, you have the right to complain to the Information Commissioner's Office.

Policy review

This policy is reviewed annually by Mulberry School Foundation Trustees. Changes are detailed in the version control table at the front of the policy. The most recent policy is available on the Foundation's website at www.mulberryschools.foundation.org.