**PRIVACY STATEMENT**

The Shanly Foundation is committed to protecting your personal data.

This privacy statement sets out how The Shanly Foundation collects and processes your personal data, including but not limited to your use of the website "the Website" (www.shanlyfoundation.com), regardless of where you visit it from (including any data you may provide through the Website) and it tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

1. **Controller**

The data controller is The Shanly Foundation (company number: 11464054), a charity registered with the Charities Commission (with registered charity number 1182155) and whose registered office address is at Sorbon, Aylesbury End, Beaconsfield, Buckinghamshire HP9 1LW. Where we mention "we", "us" or "our" in this privacy statement, we are referring to The Shanly Foundation.

The Shanly Foundation is not required to appoint a data protection officer but if you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact our Data Privacy Team using the details set out below:

1. **Contact details**

The Shanly Foundation

Sorbon
24-26 Aylesbury End
Beaconsfield
Buckinghamshire
HP9 1LW

Email address: info@shanlyfoundation.com

Telephone number: 01494 671 331

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1. **Scope of Collection**

The Shanly Foundation may collect and process the following data about you:

* *Information that you provide if you submit an application for funding or other financial assistance from The Shanly Foundation. In order to consider your application, we will need to collect your organisation name, postal address, email address, telephone number and various information relating to the financial position of your organisation. You may also submit information on your organisation's net assets and creditors if you wish to do so. Contact will then be made with you, using the details that you submit.*
* *Personal information, such as; your name, address and contact details (if you provide these along with the organisation’s details).*
* *The Shanly Foundation may also ask you for information if you report a problem with the Website.*
* *Details of your visits to the Website including, but not limited to: traffic data, location data, weblogs and other communication data, whether this is required and the resources that you access.*

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

1. **If you fail to provide personal data**

Where we need to collect personal data by law, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

1. **IP addresses**

The Shanly Foundation may collect information about your computer, including, where available, your IP address, operating system and browser type for system administration and to report aggregate information to its advertisers or third party partners. This is statistical data about The Shanly Foundation's users' browsing actions and patterns and does not identify any individual.

1. **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookies Policy](https://www.shanlyfoundation.com/misc/cookie-policy/).

1. **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

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| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To decide whether to select you for a grant | (a) Identity(b) Contact | Necessary to protect our legitimate interests |
| To distribute funds to you as a beneficiary of The Shanly Foundation  | (a) Identity(b) Contact | (a) Necessary for protecting our legitimate interests and for keeping our records updated, to track how the funds are used |
| Administration purposes1. Notifying you about changes to our terms or privacy policy
2. Managing The Shanly Foundation (including being audited)
 | (a) Identity(b) Contact (c) Financial | Necessary for our legitimate interests for compliance with a legal obligation |
| Managing risks relating to The Shanly Foundation, including risk, fraud risk and operational risk | (a) Identity(b) Contact(c) Financial(d) Transaction(e) Profile | Necessary for our legitimate interests (verifying the legitimacy of your charity, including where you are a recipient of a grant and for the development of risk management policies, models and procedures used both in the management of our relationship with you). |
| Use data analytics to improve our websites, services, marketing, and experiences | (a) Technical(b) Usage | Necessary for our legitimate interests (to define types of users for our grants, to keep our websites updated and relevant, to develop The Shanly Foundation) |

1. **Uses made of the information**

The Shanly Foundation uses information held about you in the following ways:

* To contact you about your funding application.
* To keep you updated about our activities and information we think would be relevant to you.
* To consider and assess your funding application, which may include consideration by the trustees of The Shanly Foundation.
* To ensure that content from the Website is presented in the most effective manner for you and for your computer.

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.

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.

1. **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

* External Third Parties; being:
	+ Service providers acting as processors or joint controllers (as the case may be) based in the United Kingdom who provide IT and system administration services, grant management software or other services related to the performance of our contractual obligations to you and/or where necessary for our legitimate interests and which shall include (but which shall not be limited to) Benefactor Grant Management Software supplied and operated by Gallery Partnership.
	+ Professional advisers acting as processors or joint controllers (as the case may be) including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services to The Shanly Foundation.
	+ HM Revenue & Customs, the Charities Commission, and other regulators and authorities acting as processors or joint controllers (as the case may be) based in the United Kingdom who may require reporting of processing activities in certain circumstances, or where we are compelled to do so by law.

and

* Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

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 allow 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.

1. **International transfers**

Owing to the global nature of internet and cloud-based infrastructure, your personal data may be transferred outside the UK and the European Economic Area (“EEA”). Whilst some countries have adequate protections for personal data under the laws applicable in those countries, in other countries, steps will be necessary to ensure appropriate safeguards are in place. We use a number of cloud-based applications and support services provided by third party providers who (and whose servers) may be based outside the EEA. We take appropriate steps to ensure that any such third parties provide an adequate level of protection in relation to any information you provide.

By providing your personal data to us in accordance with this policy, you consent to any such transfers of any information outside of the EEA.

1. **Your Rights**

You have the right to:

* **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal data 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.
* **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
* **Request restriction of processing** of your personal data. 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.
* **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
* **Withdraw consent at any time** where we are relying on consent to process your personal data. 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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

The Website may, from time to time, contain links to and from the websites of The Shanly Foundation's partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that The Shanly Foundation does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

1. **Data security**

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 those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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.

You acknowledge that the transmission of information (including your personal data) to us via the internet is not completely secure. Although we will do our best to protect your Information as set out above, we cannot completely guarantee the security of information (including your personal data) transmitted to us via our websites or by e-mail.

1. **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

1. **Acceptance**

By using this website, you consent to the collection and use of this information by The Shanly Foundation and to this Privacy Policy. If The Shanly Foundation changes this Privacy Policy in any way, it will post these changes on this page.

1. **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. 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.

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| **Version** | **Date** | **Review Frequency** | **Next Review** |
| 1.2 | August 2025  | Annually | August 2026 |