

## PRIVACY POLICY



### 1. Who we are

Shanly Foundation ("the Foundation") is committed to protecting your personal data. We are a registered charity (no. 1182155) and a company limited by guarantee (no. 11464054). Our registered office is Sorbon, 24-26 Aylesbury End, Beaconsfield, Buckinghamshire, HP9 1LW.

We are the data controller responsible for your personal data.

### 2. Contact details

Email: [info@shanlyfoundation.com](mailto:info@shanlyfoundation.com)

Tel: 01494 671 331

Post: Sorbon, 24-26 Aylesbury End, Beaconsfield, HP9 1LW

You can complain to the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk), but we would always appreciate the chance to resolve your concerns first.

### 3. What data we collect

We may collect:

- Contact details of applicant organisations (name, address, phone, email).
- Information provided in funding applications (including organisational financial data, details of projects, trustees, and beneficiaries).
- Personal details you provide when submitting an application on behalf of your organisation.
- Technical data when you visit our website (IP address, browser type, cookies – see our [Cookies Policy]).

We do not collect "special category" data (health, ethnicity, political beliefs, etc.) or criminal offence data.

### 4. How we use your data

We process your data for the following purposes:

Purpose	Type of Data	Lawful Basis
Assessing funding applications	Identity, contact, financial	Legitimate interests (to administer charitable grants)
Distributing grants and monitoring use of funds	Identity, contact, financial	Legitimate interests (ensuring proper use of funds)
Administration (audit, compliance, updates to T&Cs)	Identity, contact, financial	Legal obligation and legitimate interests
Managing risks (fraud checks, due diligence)	Identity, contact, financial	Legitimate interests (protecting funds)

Purpose	Type of Data	Lawful Basis
Communicating with applicants and beneficiaries	Identity, contact	Legitimate interests (application queries, monitoring, updates)
Surveys and occasional updates about the Foundation	Identity, contact	Legitimate interests (feedback, transparency)
Website analytics	Technical, usage	Legitimate interests (improving site)

You may opt out of surveys or non-essential updates at any time.

## 5. Failure to provide data

If you do not provide the information we request, we may not be able to consider your application or respond to your enquiry.

## 6. Sharing data

We may share your data with:

- IT and grant management providers (including Benefactor software by Gallery Partnership),
- professional advisers (auditors, lawyers, insurers, bankers),
- regulators (HMRC, Charity Commission, ICO),
- third parties in the event of a merger or transfer of assets (new owners will be bound by this policy).

We require third parties to protect your data and use it only as instructed. We never sell your data.

## 7. International transfers

Some of our IT providers may store data outside the UK/EEA. Where this happens, we ensure appropriate safeguards (such as standard contractual clauses or adequacy decisions) are in place.

## 8. Data security

We use technical and organisational measures to protect your data. Access is limited to staff and advisers with a need to know. Data transmitted online (e.g. by email) is never fully secure; please take care when sending information.

## 9. How long we keep your data

We retain personal data only as long as necessary for the purposes described above, including legal and audit obligations. Retention periods are reviewed regularly.

## 10. Your rights

You have the right to:

- access the data we hold about you,
- request correction of inaccurate data,

- request deletion (where legally appropriate),
- object to processing (including for marketing),
- request restriction of processing,
- request transfer of your data to another party,
- withdraw consent (if we rely on it).
- complain to the ICO ([www.ico.org.uk](http://www.ico.org.uk)).

## 11. Data Subject Access Requests

If you wish to exercise your right of access under data protection law (a “Data Subject Access Request”), please contact us at [info@shanlyfoundation.com](mailto:info@shanlyfoundation.com). We may ask you to provide proof of identity before we can process your request. You are entitled to one copy of your personal data free of charge. For full details, please see our [Data Subject Access Request Policy](#).

## 12. Links to other websites

Our website may contain links to partner or third-party sites. These have their own privacy policies, and we are not responsible for them.

## 13. Changes to this policy

We keep this policy under review. Updates will be published on our website. Please check back to stay informed.

Version	Date	Review frequency	Next review
1.3	17 <sup>th</sup> December 2025	Annual	17 <sup>th</sup> December 2026