

# **RUTLISH FOUNDATION PRIVACY POLICY – FOR STUDENT GRANT APPLICATIONS (THE “PRIVACY POLICY”)**

## **INTRODUCTION – WHO WE ARE**

The Rutlish Foundation originates from a bequest made in the will of William Rutlish, embroiderer to Charles II. The current structure of the charity came into existence in 1994 with the consolidation of a number of funds under the Scheme.

The Rutlish Foundation provides the land for Rutlish School and funds for activities or to support individual students in areas where the local authority is not responsible for funding.

## **STUDENT GRANTS AND APPLICATIONS**

Each year, the Rutlish Foundation ("Rutlish Foundation" or "we" "our" "us") provides grants to assist students taking full time first degree or comparable courses and those taking further degree courses. These grants are given at the discretion of the Trustees of the Rutlish Foundation. This privacy policy (the "Privacy Policy"), applies to those who have applied to the Rutlish Foundation for a student grant.

If you are submitting an application to the Rutlish Foundation for student funding, you will have supplied us with information about yourself ("personal data"). It is important that you read this Privacy Policy in its entirety so that you are aware of how and why we process your personal data. This Privacy Policy applies in respect of student grant applications only.

## **PURPOSE OF THIS PRIVACY POLICY**

When you submit an application to us for a student grant we will use the personal data you provide as set out in this Privacy Policy. This Privacy Policy is intended to provide you with information about how we collect, use, process and look after your personal data, when you apply for a student grant. It also sets out your privacy rights and how the law protects you.

We are committed to protecting your privacy and processing your personal data fairly and lawfully in compliance with the General Data Protection Regulation (the "GDPR") and the UK Data Protection Act 2018.

## **KEEPING YOU INFORMED**

For the purposes of the GDPR, the Rutlish Foundation is a data controller in respect of your personal data. This means that when we collect personal data from you, we are responsible for determining the purpose for holding your personal data and how it is used. We will only process your personal data where we have a lawful basis for doing so and we will keep you updated about how and why we process it. If after reading this Privacy Policy, you have questions, require further information or want to exercise your legal rights, please contact The Clerk of the Trustees, Mr Graham Mills at any time using the contact details set out below:

- Full name of legal entity: THE RUTLISH FOUNDATION
- Email address: [rutlishfoundation@gmail.com](mailto:rutlishfoundation@gmail.com)
- Postal address: C/O Rutlish School, Watery Lane, Merton Park, London, SW20 9AD
- Telephone number: 07913 987 006

We encourage you be open and honest with us where you feel that we have not dealt with your concerns appropriately, or that we have not provided you with the information you require. Although we would appreciate the chance to deal with your concerns directly, you may at any time make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## **KEEPING US UP TO DATE**

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, in particular, if you have submitted a Rutlish Foundation Grant Application Form with incorrect or obsolete information, please contact us as soon as possible to rectify any

mistakes or changes in respect of the information which you provided. Failure to do so could affect your application. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

### **THE DATA WE COLLECT ABOUT YOU**

Personal data, means any information about an individual or information from which a person can be identified.

We collect, use, store and transfer different kinds of personal data about you in respect of your student grant application, whether through our Rutlish Foundation Grant Application Form or otherwise. The kind of information we collect is as follows:

- **Identity Data** includes first name, maiden name, marital status, nationality, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Academic Data** includes your academic qualifications, grades, education history, exam results, school, college or university attendance, education details, information relating to your academic career to date.
- **Financial data** includes details of your financial circumstances, bank details, annual income details, employment status, details of any other awards or grants given to you in previous years, the award amount (whether granted or requested), household financial details (for example: if you are dependent on a parent or guardian or you have any dependants, we may ask you for personal information about them in order to assess whether to award a grant and its amount.)
- **Household data** includes details about members of your household. It can include the names, addresses, residency, dates of birth, nationality, financial details, income, childcare details and/or education details of parents, guardians and/or dependents.

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. However, you may provide us with special category personal data on a voluntary basis during the grant application process.

### **HOW YOUR DATA IS COLLECTED**

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us personal data by filling in forms or by corresponding with us by post, phone, email, in person or otherwise. This includes personal data you provide when you:
  - apply for a student grant;
  - give us feedback;
  - attend an interview with the Trustees (if requested to do so); and/or
  - contact us.

Applicants may also provide personal data relevant to their grant application, about relatives, parents and/or guardians, tutors and/or other teaching staff.

### **HOW AND WHY WE USE YOUR DATA**

In order to assess your student grant application, we need to collect, store and sometimes share your personal data. Please be assured that we will only use your personal data when the law allows us to. To apply for a student grant, we require you to fill out a Rutlish Foundation Grant Application Form (which is available on our website). The Rutlish Foundation Grant Application Form asks you to provide details about who you are, why you are applying for the student grant, what qualifications you have, where you live, what school you went to, your employment status and your family background. When you submit a student grant application form, it will be shared with the Rutlish Foundation Trustees and employees of the Rutlish Foundation. The Rutlish Foundation Trustees will use the personal data you provide to assess your eligibility for a student grant and to decide about whether to award a student grant to you.

We will also process your personal data:

- to process your student grant application (or the student grant application of your dependant);
- in respect of successful grant applications, to determine the level of the grant to be awarded and to administer its receipt by the successful applicant;
- to process any complaints you may have in relation to your student grant application or the application process;
- to ensure that our records about you are up to date;
- in order to keep accurate records of Trustee and General Panel meetings;
- to answer your questions in respect of your student grant application;
- where we need to comply with a legal obligation;
- for research and statistical purposes;
- for administrative purposes in relation to the security and access of our systems and premises;
- to contact you about your student grant application;
- to comply with our legal and regulatory obligations and requests, including reporting to and/or being audited by supervisory and regulatory bodies;
- to comply with court orders and exercise and/or defend our legal rights;
- as otherwise permitted or required by any applicable law or regulation;
- the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal data (as set out in this Privacy Policy); and
- for any other legitimate interest.

Where we need to collect personal data by law, or in order to assess your application, and you fail to provide the data requested, your application for a student grant may not be considered.

## **CHANGE OF PURPOSE**

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 at the address specified above.

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, where this is required or permitted by law.

## **WHO WE MAY SHARE YOUR DATA WITH**

Sometimes we may be required to share your personal data with third parties to comply with our legal obligations, to verify information which you have provided to us as part of your application, for example: to verify details of the course or University which your student grant application relates to, to verify your academic achievements and/or your employment status.

Occasionally, we award grants in collaboration with other organisations (such as the John Innes Foundation or Rutlish School), where we do so, we will pass on your details to the third party collaborator in order to discuss your grant application and/or to issue a grant. We will only pass on your personal data to third parties that we trust and who have agreed not to process personal data which we have passed to them for any purpose other than the purposes set out in this Privacy Policy.

We may also use third party services providers (such as cloud providers) to assist us in the storing of your personal data. 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 third parties 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.

## **TRANSFERRING PERSONAL DATA TO COUNTRIES OUTSIDE THE EEA**

The personal data we collect from you may be transferred to (including accessed in or stored in) a country or territory outside the European Economic Area ("**EEA**"), including to countries whose laws may not offer the same level of protection of Personal Data as are enjoyed within the EEA. Where we do transfer personal data outside the EEA, we will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the GDPR.

## **HOW WE KEEP YOUR DATA SAFE**

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 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.

## **HOW LONG WE WILL KEEP YOUR DATA FOR**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. We will only retain your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

In certain circumstances, we may anonymise personal data about you which we hold for research or statistical purposes; where we do so, we will ensure that the personal data can no longer be associated with you. Anonymised data may be held by us indefinitely without further notice to you.

We will continue to hold the student grant application form submitted by you for a period of 7 years, unless we are required to keep it longer in order to comply with legal, regulatory or internal policy requirements.

## **YOUR RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Right of access** – you have the right to request access to your personal data. This right enables you to receive a copy of the personal data which we hold about you and to check that we are processing it lawfully;
- **Right of rectification** – you have the right to ask us to correct any of the personal data we hold about you. This right enables you to have any incomplete or inaccurate personal data which we hold about you corrected. Where this right is exercised by you, we may be required to verify the accuracy of the new data you provide to us.
- **Right to erasure** – you have the right to ask us to delete your personal data from our records if our continued use is not justified or 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 applicable law. Please 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.
- **Right to object** – you have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) to process your personal data and there is something about your particular situation which makes you want to object to us processing it – perhaps 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 objections.
- **Right to restrict processing** - you have a right to restrict the processing of your personal data. This right enables you to ask us to suspend the processing of your personal data in the following circumstances: (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.

If you wish to exercise any of the rights set out above, please contact us at using the contact details provided above.

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

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

### **CHANGES TO THIS PRIVACY POLICY**

We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulations or following an update to our internal practices. We will do this by updating this Privacy Policy on our website [www.rutlishfoundation.org.uk](http://www.rutlishfoundation.org.uk). You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

This Privacy Policy was last updated on 7 July 2021.