

## PRIVACY POLICY FOR STUDENT GRANT APPLICANTS

### 1. INTRODUCTION

1.1 In this Privacy Policy:

- 1.1.1 references to **we, us** or **our** means the Trustees of the Humanitarian Trust, a registered charity in England and Wales (number 208575), whose registered office is 20 Gloucester Place, London W1U 8HA. The list of Trustees may be found on the Charity Commission Register via the following link: <https://apps.charitycommission.gov.uk/showcharity/registerofcharities/RegisterHomePage.aspx>;
- 1.1.2 references to **you** or **your** means the person accessing and using the **Website** or **Services** (as defined below);
- 1.1.3 references to the **Website** means the Humanitarian Trust website found at <http://www.humanitariantrust.co.uk/>;
- 1.1.4 references to **Services** means the administration and provision of charitable grants for educational social and medical purposes, including the relief of hardship and disability.

### 2. PRIVACY POLICY

- 2.1 This Privacy Policy sets out the basis on which we collect and use personal information about you through your use of the Website and the Services.
- 2.2 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we may disclose it to and your rights and choices in relation to your personal information.
- 2.3 In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you.

### 3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

- 3.1 We are the data controller for the purpose of data protection law, in respect of your personal information collected and used through your use of the Website and the Services. This is because we dictate the purpose for which your personal information is used and how we use your personal information.
- 3.2 If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Privacy Policy available to the third party.

### 4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

4.1 We collect and use personal information about you in the course of providing the Website and the Services. The personal information we collect includes:

#### 4.1.1 Information that you provide to us

The information that you provide to us may include the following:

- (a) Contact information: name, address, email and telephone number;
- (b) General information: date of birth and student identification number;
- (c) Financial information: bank sort code and account number and account details, income and expenditure report;
- (d) Government and other official identification numbers (including photographic identification information): national insurance number, passport number and other passport details and tax identification number; and
- (e) Education information: information about schools you have attended, the College or University to which you have been admitted, and your course of study.

This information may be provided:

- (f) in the course of communications between you and us (including by phone, email or otherwise);

- (g) when you apply for a student grant;
- (h) when you fill in forms for us;
- (i) when you send in documents required to support your application for a grant; and
- (j) when you report a problem with our Services

**4.1.2 Information we collect from you**

- (a) Technical Information: your IP address (i.e. your computer's address on the internet).

**4.1.3 Information we receive from other sources**

- (a) Information we have obtained from your College or University.

4.2 We may also collect certain special categories of personal information about you. This may include information concerning your health or disability.

**5. INFORMATION ABOUT THIRD PARTIES**

5.1 In the course of using the Services you may provide us with personal information relating to third parties. This includes educational referees (as applicable).

5.2 For example, the personal information we collect in respect of referees may include their name, address and employment.

5.3 We will use this personal information in accordance with this Privacy Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Privacy Policy available to the third party.

**6. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?**

6.1 We use your personal information in connection with your application for a student grant. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
To communicate with you and other individuals.	The legal basis that we rely on is: <ul style="list-style-type: none"> <li>• Legitimate interest.</li> </ul>
To assess your student grant application and decide whether your application will be successful.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>
To process your grant fund to your College or University.	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
To comply with any legal or regulatory obligations (including in connection with a court order).	<ul style="list-style-type: none"> <li>• Compliance with legal obligations to which we are subject.</li> </ul>

6.2 We may be required to obtain your personal information to comply with our legal requirements. If you do not provide the relevant personal information to us, we may not be able to process your grant application.

6.3 Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

- 6.3.1 compliance with applicable legal and regulatory obligations and any codes of conduct; or
- 6.3.2 protection of the Trust, the Trustees, employees and or those of a third party.

**7. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?**

7.1 You agree that we may share your personal information with:

- 7.1.1 Prism the Gift Fund (which administers your application on our behalf); and

7.1.2 the College or University to which you want us to send your funding.

7.2 We may also disclose your personal information to other third parties, for example:

7.2.1 if we sell or buy any business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets;

7.2.2 if we or substantially all of our assets are acquired by or merge with a third party (or are subject to a reorganisation), personal information held by us will be one of the transferred assets;

7.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

## 8. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

8.1 We will process your personal information within the European Economic Area (EEA).

## 9. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION

9.1 If you are a recipient of a student grant, we will keep your personal information for the duration of the processing of your grant application and a period of 7 years after our funding ends.

9.2 If you submit an application for a grant but we do not approve your application, we will keep your personal information for a period of 12 months after your application was submitted.

## 10. YOUR RIGHTS

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights by contacting *Rina Chandwani* at [humanitariantrust@prismthegiftfund.co.uk](mailto:humanitariantrust@prismthegiftfund.co.uk)

	Summary of your rights
<b>Right of access to your personal information</b>	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
<b>Right to rectify your personal information</b>	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
<b>Right to erasure of your personal information:</b>	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
<b>Right to restrict the use of your personal information</b>	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
<b>Right to data portability</b>	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.

	<b>Summary of your rights</b>
<b>Right to object to the use of your personal information</b>	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
<b>Right to withdraw consent</b>	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
<b>Right to complain to the relevant data protection authority</b>	You have the right to complain to the relevant data protection authority, which is, in the case of the Humanitarian Trust, the Information Commissioner's Office (ICO), where you think we have not used your personal information in accordance with data protection law. The contact details for the ICO are: <a href="https://ico.org.uk/">https://ico.org.uk/</a> or 0303 123 1113.

#### **11. CHANGES TO OUR PRIVACY POLICY**

Any changes we make to this Privacy Policy in the future will be posted on this page. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

#### **12. QUERIES/CONTACT US**

If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by email at [humanitariantrust@prismthegiffund.co.uk](mailto:humanitariantrust@prismthegiffund.co.uk) or by post to 20 Gloucester Place, London W1U 8HA.

This Privacy Policy was last updated in July 2020.