

The Steel Charitable Trust Privacy Policy

Introduction

The Steel Charitable Trust ('the Trust') is a grant-making charity, registered in England and Wales with the charity number 272384. Organisations that meet its grant/applicant eligibility criteria apply for funds to support their projects, which are then awarded at the discretion of the Trustees.

The Steel Charitable Trust meets the exemption rules for some not-for-profit organisations and so is not registered as a fee paying organisation with the Information Commissioner's Office (ico). However, the Trust adheres to the requirements of the General Data Protection Regulation 2018 (GDPR) and processes the personal data it collects under the lawful basis of 'legitimate interest'.

Contacting us

The Steel Charitable Trust is a data controller in respect of your personal data. If you have any questions about its privacy policy or the way it processes your data, please contact:

The Trust Manager
The Steel Charitable Trust
Suite 411, Jansel House
Hitchin Road
Luton
Bedfordshire
LU2 7XH
Email: info@steelcharitabletrust.org.uk

Why does the Trust collect your data and how is it used?

The Trust collects limited personal data about the person who makes a funding application to the Trust on behalf of an organisation for the purposes of communication. The Trust has a legitimate interest in processing this data in order to offer an effective grants administration service.

The purpose of collecting this data is to:

- enable the Trust to ask you for additional information in support of your organisation's application
- inform you of the outcome of your organisation's application
- confirm acceptance of the terms on which grants are offered
- make one-off or staged payments to successful applicants
- monitor the progress of work that the Trust has funded
- maintain a contact history between the Trust and your organisation
- seek advice/guidance on behalf of another organisation that the Trust thinks may benefit from your experience

The Trust does not engage in any marketing activity.

What personal data does the Trust collect, and how?

Personal data is data that can be used to identify you or tells the Trust something about you. The Trust collects minimal personal data, only that which is necessary to communicate with you in relation to its core purpose of grant administration. This comprises:

- Your name (including title, which may or may not reveal your gender)
- Your job title and place of work
- Your work contact details (we never request your personal contact details; if you choose to provide them instead of work contact details, we are unlikely to be able to distinguish, but they will, in any case, be treated in the same way)
- A digital signature of the person in your organisation who can formally accept any offer of a grant (this digital signature may or may not resemble that person's wet signature)
- Logs of some email communications that have been made between you and the Trust

The Trust collects this data directly from you when you:

- Register on the Trust's website and submit a completed online application form
- Email or otherwise inform the Trust about a change in details
- Digitally sign a grant offer acceptance form
- Write to the Trust with the expectation that it will keep your details on file

The Trust aims to ensure accuracy and, if you or a colleague tell it about a change, your current record will be updated or potentially deleted.

Storing and deleting your personal data

The Trust uses a specialist database for administering grants called Benefactor. Information collected via the online application form, including supporting documents that you upload at the time or which you email directly to the Trust Manager for inclusion, is stored directly in here. Benefactor is the creation of [The Gallery Partnership](#), which is the data processor and a registered data protection fee-payer with the ico and, as such, bound by the GDPR rules. The Trust has a GDPR-compliant contract with The Gallery Partnership to store, process and protect your personal data. Benefactor is a hosted system; The Gallery Partnership states that data is stored on UK servers and stringent physical, technical and managerial procedures are in place to safeguard and secure personal data.

The Trust uses [Signable](#), an online digital signing service for grant acceptances, part of the Domo Group Ltd, a registered fee-payer with the ico. Documents are only stored in here on a temporary basis while grants are being processed.

The Trust uses Microsoft 365 for day-to-day business use including email. Microsoft software is compliant with European law in relation to data and file security. Operational emails are kept for limited periods for reference, whilst older ones are deleted from Sent and Deleted mailboxes regularly. A limited number of emails connected to changes in grant conditions may be saved indefinitely, against the relevant applicant's record in Benefactor.

The Trust keeps procedures under review annually, usually in the autumn, with regards to deletion of old contact records from Signable and Benefactor and seeks advice from The Gallery Partnership to assist if necessary from time to time. The Benefactor database is de-duped at least every quarter and old contact records deleted at the time. Unless a contact specifically requests that their contact details

are removed (after the processing of a grant is completed in the case of successful applicants), contact details will remain integrated with old application records indefinitely.

Information sharing and disclosure

The Trust will not, without your consent, supply any of your personal data to any third party except in the following circumstances:

- It is required to do so by law enforcement or regulatory bodies where this is required or allowed under the relevant legislation
- where it requires technical support on its database by a trusted specialist supplier of support services

Website

The Trust's website is built on a WordPress template and uses WordPress's default cookies. Users are informed that the website collects cookies and are given this URL, which explains what they are, their purpose and how to control them: <https://automattic.com/cookies/>. An option to 'click and accept' cookies is given. This consent is set to be sought every 30 days, so regular visitors to the site may be asked to give consent several times.

Your rights

The GDPR provides the following rights for individuals:

- The right to be informed about the collection and processing of your personal data
- The right of access to your data
- The right to rectification if the data held about you is inaccurate
- The right to erasure of your data (except in certain, specific circumstances)
- The right to restrict processing if you contest that it is being done unnecessarily or unlawfully
- The right to data portability (i.e. being given your data in a structured, digital format)
- The right to object to the use the Trust makes of your data

You can find out more about these rights and the GDPR in general, or make a complaint about the Trust in relation to its handling of personal data, by contacting the Information Commissioner's Office:

- Helpline: 0303 123 1113 Monday to Friday 9.00am – 4.30pm
- <https://ico.org.uk/>