

PRIVACY NOTICE



BACKGROUND

This Privacy Notice is for **prospective, current or past grant applicants** to The Road Safety Trust. Employees and Trustees have different Privacy Notices, as part of the organisation's compliance with GDPR.

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value your privacy and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

The Road Safety Trust is a company registered in England under company number 08837451 and charity registered under charity number 1156300. We are an independent charitable trust dedicated to supporting projects and research aimed at making the UK roads safer for all road users. We are data controllers for the purposes of the GDPR and are registered with the Information Commissioners Office.

Registered address: Colwyn Chambers, York Street, Manchester M2 3BA

Data Protection email address: dataprotection@roadsafetytrust.org.uk

2. What Does This Notice Cover?

This Privacy Notice explains:

- how we use your personal data;
- how it is collected;
- how it is held;
- how it is processed.

It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.

b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.

c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.

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d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 10 to find out more.

e) The right to restrict (i.e. prevent) the processing of your personal data.

f) The right to object to us using your personal data for a particular purpose or purposes.

g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact the Data Protection Officer using the details provided in Part 10.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, data subject damage or a distress claim then please submit a formal complaint to the Road Safety Trust via the Complaints Procedure on our website. Alternatively, you can lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do We Collect and what are our lawful bases for processing that data?

The bases that we have for collecting and processing your personal information are where we have a legitimate reason to do so and/or when you give your explicit consent. These are 2 lawful bases for the processing set out in Article 6 of the GDPR.

Legitimate Interest: When you register on our website to apply on-line, we only collect your email address. When you apply for a grant for your organisation from us, we will collect personal data so that we can contact you about your organisation's application, assess the application, contact you about any grant we can or can't make and in order to monitor the grant; and for carrying out associated administration and research. We may also contact you about events, news or research relevant to your grant, or to seek your views on our funding programmes.

Consent: If you choose to sign up to our e-newsletter via our website then you are providing us with your consent to use your personal data for sending you the e-newsletter produced by the Trust two or three times per year. This opt-in process on our website is GDPR-compliant. The Trust uses Mailchimp as the system for issuing the e-newsletter to those who have subscribed to it, and there is an opt-out facility ('unsubscribe') available within each email.

We intend to hold the minimum amount of personal data in order to process your grant application. If you give any personal data in your application about a third party (for example, the name of a project manager), we will ensure that data is kept confidential in accordance with our privacy policy, but it is your responsibility to secure consent for its use in the application first.

6. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for

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which it was first collected. The following will be taken into account when deciding how long to keep personal data:

- The need to keep accurate grant making records
- The timeframe and extent to which limited personal information needs to be retained to achieve the objective of the grant.

7. How and Where Do You Store or Transfer My Personal Data?

(a) Blackbaud Grant-Making database

We use a database and application called Blackbaud Grant-Making to assess and manage our grants and this is hosted in a secure Microsoft Azure data centre within the EU. The daily management of the database is jointly done by staff at Buzzacott and Blackbaud Europe. In the unlikely event that an escalation has to happen, technical support staff from Blackbaud in the US may access the database for additional technical support purposes only. The process is covered by the standard contract clause and complies with GDPR and the Data Protection Act 2018.

Blackbaud maintains numerous security certifications including:

- PCI-DSS & PCI PA-DSS
- SOC1
- SOC2
- HIPAA
- Sarbanes Oxley
- EU-US Privacy Shield*

*On 16 July 2020 the European Court of Justice (ECJ) concluded that the EU-US Privacy Shield Framework does not provide adequate protection for EU citizens' personal data under GDPR and is therefore invalid. While Blackbaud was signed up to Privacy Shield and must still comply with that in the USA, Blackbaud uses Standard Contractual Clauses in its agreements/contracts. These are issued by the EU and ensure that Blackbaud treats any personal data transfers between Europe and the USA in compliance with EU data protection law (GDPR), hence The Road Safety Trust considers that adequate protection is provided for applicants and grantees within the Blackbaud Grant-Making database and application.

For more information please visit their website – <https://www.blackbaud.com/security>

Buzzacott's Business Continuity plan has been designed to ensure systems are in place of prevention and recovery to deal with any potential threats. Buzzacott has the Cyber Essentials accreditation and as a regulated entity under the ICAEW are scrutinised on their approach to information security and confidentiality.

(b) MailChimp

Subscription to The Road Safety Trust's eBulletin is voluntary and subscribers have the option to opt out at any time. The eBulletin is delivered through MailChimp. As MailChimp stores the names and email addresses of subscribers of individuals on our mailing list and because MailChimp is a US-owned company, there may be some limited international data transfer involved in their management of the eBulletin. MailChimp has satisfied the Trust regarding its compliance with GDPR and the Data Protection Act 2018. More information can be found here:

<https://mailchimp.com/help/mailchimp-european-data-transfers/>

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(c) International Data Transfers

Whilst we ensure that the majority of our systems hold data within the UK or the European Economic Area, there may be occasions where we need to transfer your data to countries outside of the European Economic Area (e.g. see info re MailChimp above). In such cases, we will ensure that such transfers comply with the GDPR and the Data Protection Act 2018. Appropriate measures will be put in place to keep your data secure.

8. Do You Share My Personal Data?

We may use assessors, advisors, or consultants to assist us with the grant application and management process, including evaluation and research activities. We will ensure a data processing agreement which meets the standards of GDPR is in place. This is a legitimate interest as it helps to ensure the quality and impact of our funded work.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

10. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: dataprotection@roadsafetytrust.org.uk

Postal Address: Data Protection Officer – The Road Safety Trust, Colwyn Chambers, York Street, Manchester M2 3BA

11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change the way we work in a way that affects personal data protection. Any changes will be made available on our website.