

The Funding Network (TFN) is committed to protecting and respecting stakeholders' privacy – including, but not limited to members, donors, staff, trustees, grantees, partners, applicants and attendees. This notice sets out the basis on which we process any personal data and lays out our practices regarding personal data and how we treat it. It also ensures that TFN:

- complies with data protection law and follows good practice
- protects the rights of staff, members, non-profits, attendees and partners
- is open about how it stores and processes individuals' data
- protects itself from the risks of a data breach

For the purpose of the General Data Protection Regulation (GDPR) Act, the data controller is The Funding Network, 16 Lincoln's Inn Fields, London WC2A 3ED.

Data protection

GDPR is an EU-wide regulation, which becomes effective in the UK from 25th May 2018 and replaces the Data Protection Act 1998. GDPR gives individuals more rights and protection in how their personal data is used by organisations; data protection principles remain largely unchanged.

TFN needs to hold and process personal data and has responsibilities under the forthcoming GDPR Act. The main principles of the Act state that personal data must be:

- obtained and processed fairly and lawfully
- held for lawful purposes only
- adequate, relevant and not excessive
- accurate and kept up-to-date
- accessible by the individual who may ask for the data to be corrected
- secured against unauthorised access, disclosure or destruction and accidental loss

We only process personal data under one of the following lawful purposes:

1. **Consent:** someone has given clear consent for us to process their personal data for a specific purpose, including information about TFN events, membership benefits and payment details.
2. **Contract:** the processing is necessary for a contract we have with an individual, or because they have asked us to take specific steps before entering into a contract.
3. **Legal obligation:** the processing is necessary for us to comply with the law, such as home address and consent for Gift Aid claims.
4. **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. TFN keeps personal data for historical, statistical and research purposes so that we can understand giving patterns and third sector needs to better serve our purpose.

Information we may collect from individuals

We may collect and process information (such as names and contact details) that individuals provide to us:

- by filling in forms on our website at www.thefundingnetwork.org.uk – including, but not limited to, information provided when booking places for an event, subscribing to our mailing list, signing up as a member or submitting an application form to request funding
- by filling in a hard copy of the membership form
- by filling in a pledge form at one of our live crowdfunding events

- when submitting an impact report, a year after receiving funding
- when contacting us by email, telephone or post, as we may keep a record of that correspondence
- by uploading content to our website or social media channels – including, but not limited to LinkedIn, Facebook, Twitter, Instagram, YouTube

We may also collect and process information about individuals from our website including, but not limited to traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise.

Information we may collect from other sources

We may collect additional information from a wide range of publicly available sources, in line with our responsibilities as a fundraising and grant-making charity and in order to conduct due diligence on an application sponsored or submitted by an individual. If it is necessary to process sensitive personal data, we will apply appropriate safeguards, we will seek the individual's consent and we will not disclose the information to any third party.

IP addresses and cookies

We may collect information about an individual's computer, including the IP address, operating system and browser type, for system administration and to report aggregate information to our website host. This is statistical data about our users' browsing actions and patterns.

For the same reason, we may obtain information about an individual's general internet usage by using a cookie file which is stored on the hard drive of their computer. Cookies contain information that is transferred to a computer's hard drive. They help us to improve our site and to deliver a better, more personalised service by:

- estimating the size of our audience and their usage pattern
- storing information about individual preferences, and so allowing us to customise our site according to individual interests
- speeding up searches
- recognising users when they return to our site

Individuals may refuse cookies by activating the setting on their browser which allows them to refuse the setting of cookies. However, if they select this setting they may not be able to access certain parts of our site. Unless the browser setting has been adjusted to refuse cookies, our system will issue cookies when an individual logs on to our site.

Where we store personal data

By submitting personal data, individuals agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this privacy notice.

All information provided to us is stored on our secure services. Any payment transaction is encrypted. Where we have given an individual (or where they have chosen) a password which enables them to access certain parts of our site, they are responsible for keeping this password confidential. We ask individuals not to share a password with anyone.

It is worth noting that the transmission of information via the internet is not completely secure. Although we will do our utmost to protect personal data, we cannot guarantee the security of the data transmitted to our site; any transmission is at the individual's own risk.

Once we have received an individual's information, we will use strict procedures and security features to try to prevent unauthorised access. However, our site could be subject to unauthorised access and though we take steps to prevent this, we cannot guarantee that it will not occur.

Uses made of personal data

We may use personal data to:

- ensure that content from our site is presented in the most effective manner
- provide information about events and other services that individuals request from us or which we believe may interest them, where they have consented to be contacted for such purposes
- carry out our obligations arising from any contact entered with us
- allow participation in interactive features of our events or other services, when opting in
- notify individuals about changes to our services
- send fundraising communications inviting individuals to attend our events or to support some of our initiatives, in accordance with the GDPR Act and with the Privacy and Electronic Communications Regulations (PECR) of 2003
- conduct public research on an individual if they sponsor a project or submit a funding application, for due diligence purposes and in accordance with our responsibilities as a fundraising and grant-making charity
- deal with enquiries and requests
- provide and personalise our services
- administer funding application and impact report records
- compile statistical and qualitative information about giving trends within TFN's fundraising and grant-making activities to improve our practices
- to maintain information as a reference tool or general resource

Disclosure of your information

We may disclose information to third parties if we are under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and other agreements or to protect the rights, property, safety of TFN or others.

We may also share data with a designated data processor, for example to process payments or send communications. In this case, the processor is bound by a contract to only act on our instructions, as well as to enact security equivalent to ours in regards to GDPR requirements.

Apart from the circumstances above, we will never share your personal data with third parties without individual explicit consent to do so.

External links

Our website may, from time to time, contain links to and from websites of partners, hosts and affiliates. If an individual follows a link to any of these websites, they should note that these sites have their own privacy policies and that we do not accept any responsibility or liability for their policies.

Individual rights – direct marketing

An individual has the right to prevent their personal data being processed for direct marketing. They may exercise this right at any time by communicating their wish to do so in writing (either by email or hard copy) to The Funding Network.

When we receive a request, we aim to stop contacting the individual immediately; in exceptional cases, this may take up to 28 days from receiving the notice in the case of email communications, or two months in the case of post.

When exercising this right, individuals are kindly requested to include 'unsubscribe' in the subject line, as well as their name and the address/ email by which they were contacted. All fundraising communications from TFN will contain further details on how to do this. We will also make every

effort to act on such requests made via telephone, although we do not recommend this method as it may complicate the administrative process and lead to errors.

If an individual wishes to opt out as described above, but does not have an email to reply to (e.g. they were contacted by post, but wish to opt out by email), they may do so by sending an email specifying their name and email address, with 'unsubscribe' in the subject line, to info@thefundingnetwork.org.uk. It is possible also opt out by phone on 0845 313 8449, or by sending a letter to **The Funding Network, 16 Lincoln's Inn Fields, London WC2A 3ED**.

TFN may retain enough information about the individual to stop including that person in future direct marketing activities. If an individual feels their rights under the Act or other legislation have been infringed, they have the right to complain at any time to the Chief Executive at TFN in the first instance.

Individual rights – access to information

The Act gives individuals the right to access information held about them. This right of access can be exercised in accordance with the Act. We will require proof of identity before providing details of any personal information we may hold about them. Any access request may be subject to a fee of £10 to meet our costs in providing details of the information we hold.

Requests may be made in writing (either email or hard copy) to TFN. Within 40 days of receipt of this, we will send a summary of:

- whether any personal data is being processed;
- what personal data is held, the reasons it is being processed, and whether it will be given to any other organisations or people.

They will also be sent a copy of the information comprising the personal data held, and given details of the source of the data (where available).

If someone submits their request via email, they are kindly asked to send it to info@thefundingnetwork.org.uk with 'Subject Access Request' in the subject line. Sending it without this wording or to an alternative email address, such as that of an individual member of staff, will not guarantee prompt attention. The request should also include brief details of the information of which they would like a copy to help us locate the data.

Retention of data

TFN keeps personal data for historical, statistical and research purposes so that we can understand giving patterns and third sector needs to better achieve our mission. Personal data held for these purposes may be kept indefinitely as long as it is not used in connection with decisions affecting particular individuals, or in a way that is likely to cause damage or distress.

Removal of data

All data removed from our systems will be done in accordance with legal guidelines, which may be subject to change from time to time.

Contact

Any question, comments or requests regarding this privacy notice are welcome and should be sent to the **Chief Executive, The Funding Network, 16 Lincoln's Inn Fields, London WC2A 3ED**.