



THE TALENT FOUNDRY TRUST (TTF) GENERAL PRIVACY NOTICE

1 INTRODUCTION

- 1.1 We are committed to protecting and respecting your privacy. The Talent Foundry Trust is an education charity. In this privacy notice, references to “we”, “us”, “our”, or “TTF” is a reference to The Talent Foundry Trust.
- 1.2 This privacy notice deals with any personal data we process which is not covered in our employee privacy notices. It sets out the basis on which any personal data we collect from you is handled by us in the course of our relationship with you. For example, this notice applies to you if you are a potential recruit, corporate partner or potential corporate partner, volunteer, supplier or potential supplier, alumni, student taking part in our programmes, representative from a school taking part in our programmes or a representative from a school eligible to take part in our programmes.
- 1.3 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.4 For the purposes of the General Data Protection Regulation 2016/679, The UK Data Protection Act 2018/UK GDPR (“GDPR”) and any additional laws or guidance issued by the UK Information Commissioner’s Office (ICO), TTF is the data controller and our registered charity office is c/o Goodman Jones LLP, 1st Floor Arthur Stanley House, 40-50 Tottenham Street London W1T 4RN.
- 1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

2 TRANSPARENCY ON LAWFUL BASIS FOR PROCESSING

- 2.1 **Consent:** We rely on your explicit consent for processing activities such as direct marketing and collecting sensitive personal data.
- 2.2 **Contractual necessity:** We process data to fulfil a contract with you, such as managing and administering participation in our programmes.
- 2.3 **Legal obligation:** Certain data is processed to comply with legal obligations, e.g., safeguarding and recruitment record keeping.
- 2.4 **Legitimate interests:** This includes activities like improving our services, providing our free services to you, fundraising, and security measures.

3 INFORMATION WE COLLECT ABOUT YOU

Information you give us

- 3.1 You may give us personal data about you, in several ways; these include:

- 3.1.1 Through a third party, for example your school, teachers, family members or personal assistant you choose;
 - 3.1.2 by visiting our office spaces:
 - 3.1.3 during an interview or meeting;
 - 3.1.4 corresponding with us by phone, email or post;
 - 3.1.5 sending information directly to us, or providing information as requested by us and/or which is necessary from time to time (for example: a job application or through an application to join one of our programmes)
 - 3.1.6 publishing information into the public domain such as information included on a school website
 - 3.1.7 completing a survey
- 3.2 The information given to us may include (depending on your relationship with us) the following information about you:
- 3.2.1 full name;
 - 3.2.2 photograph;
 - 3.2.3 marital status;
 - 3.2.4 National Insurance number;
 - 3.2.5 salary and employment history
 - 3.2.6 contact details (including home or school address, email address (work and/or home), and mobile, home and/or work phone number);
 - 3.2.7 financial information (for example payee or donor details);
 - 3.2.8 passport details, nationality, photographic ID
 - 3.2.9 other information relating to immigration status;
 - 3.2.10 previous educational records and achievements;
 - 3.2.11 information required for complying with our safeguarding and safer recruitment procedures
 - 3.2.12 information regarding a criminal record, in criminal records certificates, enhanced criminal records certificates;
 - 3.2.13 information about your physical or mental health, or disability status, dietary requirements or access requirements to ensure your health and safety at our sites and to assess your fitness to work and to provide appropriate adjustments;
 - 3.2.14 information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;
 - 3.2.15 references (as an applicant or potential supplier);
 - 3.2.16 socio-economic background or status, and

3.2.17 interests, and giving history

Technical information we collect about you when you visit our website

With regard to each of your visits to our website we may automatically collect the following information:

3.2.18 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

3.2.19 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.

3.3 Our website may contain links to and from the websites of our partner networks, funders, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this notice and may have their own privacy notices. We do not accept any responsibility or liability for these notices. Please check these third party notices before you submit any personal data to these websites.

Information we receive from other sources

3.4 We may be working closely with third parties (including, for example, schools, previous employers, corporate partners, payment and delivery services) and may receive information about you from them.

4 CONTACT US

4.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Officer at The Talent Foundry Trust, c/o Goodman Jones LLP, 1st Floor Arthur Stanley House, 40-50 Tottenham Street London W1T 4RN.

5 USES MADE OF THE INFORMATION

Information you give to us

5.1 We will use the information you give to us to pursue the following legitimate interests (as applicable to our relationship with you):

5.1.1 promote the objects and interest of our programmes to young people

5.1.2 ensure the most efficient management of TTF and ensure that TTF's legal obligations are adhered to;

5.1.3 to store this information on our management information system/s;

5.1.4 to enforce our terms of use with you or any other contract we may have with you;

5.1.5 for the purposes of recruitment;

5.1.6 to enable us to receive your services

- 5.1.7 to enable you or students from your school/college to take part in the programmes we offer
- 5.1.8 to manage payments, fees and charges
- 5.1.9 to organise/facilitate donations and fundraising activities
- 5.2 In order to pursue the legitimate interests referred to in paragraph 5.1, we may rely on software applications and other technology to process personal data about you. These include databases and our finance systems. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your information is kept secure.
- 5.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us or receive the services we request from you. For example, we may be recruiting you for a role at TTF, or engaging you to supply us with services and will use personal data where necessary to recruit you or receive your services.
- 5.4 In addition, we may be required by law to do the following (which is not an exhaustive list):
 - 5.4.1 keep an accounting record of payment; and
 - 5.4.2 keep a record to evidence fair recruitment processes.
- 5.5 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Officer (see paragraph 3).

Information we may collect about you from our website

- 5.6 We will use this information for the following legitimate interests:
 - 5.6.1 to contact you or your school if you have made an enquiry about one of our current, past or future programmes or if you would be eligible to do so;
 - 5.6.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - 5.6.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;
 - 5.6.4 as part of our efforts to keep our website safe and secure.
 - 5.6.5 to ask you to leave a review or take a survey

Information we receive from other sources

- 5.7 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a reference from a previous employer relating to you, which may impact a recruitment

decision and we may collect details of your dietary needs from your school to enable us to ensure these are met as appropriate when you are taking part in one of our programmes and refreshment are provided.

- 5.8 As a charity which fundraises, we undertake in-house research and may engage specialist agencies to gather information about you from publicly accessible sources, for example Companies House, company websites, 'rich lists', social networks such as LinkedIn and news archives. We may also carry out wealth screening to fast track the research using trusted third-party providers. You will always have the right to opt out of this processing. We may also carry out research using publicly accessible sources to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We use research to carry out due diligence on donors to meet money laundering regulations. This research helps us to understand more about you as an individual so we can focus on conversations we have with you about fundraising and supporting in the most effective way and ensure we provide an experience that is appropriate to you. This involves gathering publicly available data and using trusted third-party providers.
- 5.9 You can opt out of this processing at any time by contacting info@talentfoundry.org.uk.

When we disclose information

- 5.10 In order to pursue one of the legitimate interests set out above, we may share your personal information with:
- 5.10.1 People engaged to work on behalf of TTF for example our freelance Facilitators who are contracted to deliver our services to you;
 - 5.10.2 local authorities, education authorities (for example, Ofsted), the Department for Education, SEND co-ordinators, social services or the police where we have reason to believe there are safeguarding concerns in respect of a child;
 - 5.10.3 venues or corporate offices, which may require information about accessibility or dietary requirements, or names for access through security.
- 5.11 We share your data with third parties who have entered into a data-sharing agreement with us, ensuring compliance with UK GDPR. These include:
- 5.11.1 corporate partners, professional advisors, suppliers and sub-contractors for the performance of any contract or agreement we enter into with them or you.
 - 5.11.2 We routinely review these agreements to ensure data protection standards are upheld.
- 5.12 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our contract (between us and you) and other agreements.

Where we need to get your consent

- 5.13 We will not market our services to you (other than in accordance with paragraph 5.1.8 above) without your consent and you have the right to ask us not to use your contact details for marketing. Please contact info@talentfoundry.org.uk if you no longer wish to be contacted by us.

6 YOUR RIGHTS

6.1 Under GDPR, you have the following rights:

6.1.1 **Right to rectification.** You have the right to have inaccurate personal data about you updated.

6.1.2 **Right to erasure.** You have the right to request that we delete your personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing; (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.

6.1.3 **Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing

6.1.4 **Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.

6.1.5 **Right to object.** You have the right to raise an objection to any of our processing in paragraph 5. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.

6.1.6 **Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.

6.1.7 **Right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.

6.1.8 **Right to request access.** You have the right to access personal data we hold about you. Please contact our Data Protection Officer if you wish to do so at info@talentfoundry.org.uk

6.2 **Exercising Your Rights:** You can submit a request to exercise your rights (e.g., access, correction, erasure) by contacting our Data Protection Officer. We aim to respond within one month of receiving your request. In some cases, this may be extended by an additional month if your request is complex or if we have received multiple requests from you.

7 HOW LONG WE KEEP PERSONAL INFORMATION

7.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.

7.2 We follow a data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Officer.

8 USE OF OUR WEBSITE

8.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8.2 Cookies and Tracking Technologies:

8.2.1 Our website uses cookies to enhance your browsing experience. These may include essential cookies for website functionality, analytical cookies to improve performance, and marketing cookies. For more details, please refer to our Cookie Policy.

9 DATA BREACH NOTIFICATION

9.1 If a personal data breach occurs and poses a risk to your rights and freedoms, we will notify you without undue delay. For severe breaches, we will also report the incident to the Information Commissioner's Office within 72 hours.

10 CHANGES TO OUR PRIVACY NOTICE

10.1 Any changes we make to this privacy notice in the future will be posted on our website and added to our booking forms. Where possible and appropriate, notified to you by email.