

Stewart Ivory Financial Education Trust (SIFET)

General Privacy Notice

1 Who we are

We are the Stewart Ivory Financial Education Trust (**SIFET**), a Scottish charitable incorporated organisation with company number CS001889 and a Scottish registered charity with charity number SC045517.

We are a data controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) and related data protection legislation.

2 How to contact us

If you have any questions about this privacy notice or our data protection policies generally, please contact us:

By post: Project Manager, Stewart Ivory Financial Education Trust (**SIFET**), 110 George Street, Edinburgh, EH2 4LH

By email: kris.paterson@sifet.org.uk

These contact details are subject to change in the event that a new Project Manager is appointed, however we will update our website accordingly to inform you of the new details.

3 Purpose of the Privacy Notice

We are committed to protecting your personal data and your privacy. This Privacy Notice sets out the basis on which any personal data that you provide to us or that we obtain from a third party will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Before we process your personal data, we are obliged to inform you of who we are, why we need to process your personal data, what we will do with your personal data and with whom we may share your personal data.

It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. Any other privacy notice or fair processing notice will supplement (not override) this Privacy Notice.

This Privacy Notice is issued on behalf of SIFET only and does not apply to any of our trustees.

4 To whom does this Privacy Notice apply?

This Privacy Notice applies to any individual whose personal data is obtained by SIFET, as set out in the table in the Schedule.

5 About the personal data we collect and hold

The table set out in the Schedule summarises the personal data we collect and hold, how we use it (our processing purposes) and why we use it (the lawful bases of processing).

We seek to ensure that our personal data collection and processing is always proportionate. We will notify you of any changes to the categories of personal data we collect or to the purposes for which we collect and process any personal data.

6 How do we collect your personal data?

6.1 **Automatically:** in respect of users of our website only, we may obtain personal data as you browse our website certain information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, and other similar technologies. Please see our Cookie Notice for further information.

6.2 **Directly from you:** identity, contact, financial, transaction and similar data is provided directly by you when you contact us by telephone, e-mail, post or otherwise, enter into a contract with us, provide a donation, become a trustee, or similar. This applies in particular to project manager(s), administrator(s), FEOs, trustees, donors and business contacts.

6.3 **From third parties or public sources:**

- we may obtain identity and contact details from publicly available sources such as Companies House or other organisations' websites. This applies in particular in relation to donors and potential donors and to business contacts.
- we may obtain identity details about participants of our courses from FEOs in response to surveys and feedback.
- we may obtain identity and contact details about donors and potential donors, trustees and potential trustees and business contacts from other donors, trustees and business contacts.

7 Communication

We intend to send updated information (generally in the form of our Annual Report or an individual report if an update on SIFET is requested by a donor and these will be sent by email) to our donors and to our contacts who may be potential donors in order to keep you informed about SIFET's charitable aims. We also would like to seek new donations from our donors and potential donors from time to time.

Where you have previously provided a donation to us, we may contact you from time to time for the purpose of providing you with appropriate communications on the basis of our legitimate interests in maintaining our joint relationship. We will not contact you for these purposes if you have at any point opted out of receiving such communications from us.

Where you are a potential donor or any other business contact, you will only receive communications from us if you have consented to, and not at any point opted out from, receiving such communications from us.

Opting out from receiving communications from us is easy and you may do so at any time by contacting us using the details above. We will process your request to be opted out of marketing within 30 days of receipt.

Where you opt out of receiving these communications, we may still process your personal data for other required purposes as specified in this Privacy Notice.

We will not sell or transfer your personal data to any other organisation for the purposes of their direct marketing.

8 With whom do we share your personal data?

There may be circumstances in which we may also need to share your personal data with certain third parties. The third parties to which we may transfer your personal data include:

- our trustees for the purpose of ensuring our trustees are fully aware of SIFET's activities;
- our accountants and auditors for the purpose of preparing management or statutory accounts;
- legal advisors for the purpose of establishing, exercising or defending our legal rights;
- any relevant regulatory authority, including HM Revenue & Customs, the Office of Scottish Charities Regulator, Companies House, courts or tribunals; or
- any third party acquiring all or a substantial part of our assets (where such assets include your personal data).

9 **International transfers**

We do not transfer any personal data outside of the European Economic Area (to be reviewed post Brexit).

10 **Automated-decision making or profiling**

We do not use any automated-decision making or profiling in respect of your personal data.

11 **Accuracy of your data**

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

12 **How long do we retain your personal data?**

We will not retain your personal data for longer than is necessary for the purposes for which the personal data is processed. This means that your data will only be retained for as long as it is still required to provide you with services or is necessary for legal reasons.

Generally speaking, we will usually retain your personal data for six (6) years following expiry of any contracts or arrangements between us, unless we are obliged to retain your personal data for a longer period as a result of an overriding legal obligation or in order to establish, defend or exercise legal rights.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Using these criteria, we regularly review the personal data which we hold and the purposes for which it is held and processed.

When we determine that personal data can no longer be retained (including where you exercise a right of erasure (see below for further details)), we ensure that this data is securely deleted or destroyed.

For more details about our retention periods, please contact us using the details above.

13 **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third

parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where we are legally required to do so.

14 Your rights

14.1 Your personal data is protected by legal rights, which include your rights to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (data portability).** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

14.2 If you wish to exercise any of these rights, please contact us using the details above.

14.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any

person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- 14.4 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 14.5 You also have the right to complain to the Information Commissioner's Office, which regulates the processing of personal data, about how we are processing your personal data.

Updated May 2020

SCHEDULE

About the information we collect and hold

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<p>Website users</p> <ul style="list-style-type: none"> any visitor to our website (www.sifet.org.uk) 	<p>Technical data (including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website)</p> <p>Usage data (including information about your visit and how you use our website)</p>	<p>To improve the user experience and functionality of our website.</p>	<p>Legitimate interests: to maintain network security and website relevance.</p>
<p>Project manager(s) and administrator(s)</p> <ul style="list-style-type: none"> Individual representative of a corporate entity 	<p>Identity data</p> <p>Project manager(s) (including full name (including any former names), marital status, title, date of birth and sex)</p> <p>Administrator(s) (including full name and title)</p> <p>Contact data</p> <p>Project manager(s) (including home address, email address and telephone numbers)</p> <p>Administrator(s) (including business address, business email address and business telephone numbers)</p>	<p>To engage suitably qualified project managers and administrators to manage and administer the business of SIFET.</p>	<p>To perform a contract with you or to take steps to enter into a contract with you.</p> <p>Legitimate interests: to maintain a well-run organisation.</p>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<p>Financial education officers</p> <ul style="list-style-type: none"> Individual FEOs FEOs who contract with us via a service company or other organisation 	<p>Identity data (including full name (including any former names), marital status, title, date of birth and sex)</p> <p>Contact data (including home address, email address and telephone numbers)</p> <p>Financial data (including bank account details and payment details)</p> <p>Biographical data (including employment history, education and qualifications)</p> <p>Presentation data (including details of schools visited by you, presentations delivered and feedback received)</p> <p>Disclosure Scotland PVG certificates (including data relating to any criminal convictions or offences (which is subject to additional protections))</p>	<p>To engage suitably qualified self-employed financial education officers to provide financial education at schools on behalf of SIFET. This includes requesting a PVG certificate to ascertain your suitability to work with children and vulnerable adults and to link this with the PVG central database.</p> <p>To fulfil our obligations under any contract or letter of engagement with you or relating to you, including making payments to you.</p> <p>To monitor your performance, on the basis of feedback received from teachers and pupils at the partner school(s) where you provide your education services.</p> <p>If required, in due course, to publish your summary CV or bio on our website, with your prior approval of the text.</p>	<p>To perform a contract with you or to take steps to enter into a contract with you.</p> <p>Legitimate interests (of SIFET, the partner schools and of the school children): to carry on the purposes of SIFET's business and charitable aims of providing a programme of financial education which is principally aimed at senior pupils in Scotland who are about to leave school.</p> <p>Where we process your personal data in connection with the PVG certification, we do so on the basis of your explicit consent when providing such certification.</p>
<p>Participants*</p> <ul style="list-style-type: none"> any participants of one or our financial education courses 	<p>Identity data We may occasionally receive personal data relating to a participant (for example on a feedback form or survey), but we do not seek to obtain any such data.</p>	<p>To monitor the performance of the relevant FEO providing a course.</p>	<p>Legitimate interests (of SIFET and of our partner schools): to provide suitable financial education in accordance with our charitable aims.</p>
<p>Donors</p> <ul style="list-style-type: none"> individual donors (current and former) 	<p>Identity data (including full name and title)</p> <p>Contact data (including home address, email address and telephone numbers, and sometimes</p>	<p>To seek and receive donations from you or from your organisation.</p>	<p>Legitimate interests: to seek sufficient finance to pursue our charitable aims.</p>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<ul style="list-style-type: none"> representatives of our corporate donors (current and former) 	business address, business email address and business telephone numbers Financial data (since 2010) (including bank account details and payment details) Transaction data (including details about any current and previous donations to SIFET)		
Trustees <ul style="list-style-type: none"> individual trustees representatives of our corporate trustees 	Identity data (including full name (including any former names), marital status, title, date of birth and sex) Contact data (including home address, email address and telephone numbers, and sometimes business address, business email address and business telephone numbers) Biographical data (including relevant financial experience, education and qualifications)	To provide you with updates on the progress and activities of SIFET. To maintain a register of our trustees and to organise meetings of trustees. To comply with any reporting obligations, including the preparation of annual accounts and the provision of certain information to the Office of Scottish Charities Regulator. To publish your summary CV or bio on our website, with your prior approval of the text.	To comply with our legal obligations. Legitimate interests: to ensure that our trustees are well-informed of SIFET's activities and to ensure that SIFET raises its profile by publicising the experience of its trustees.
School & Business Contacts actual or prospective business contacts, including: <ul style="list-style-type: none"> staff at our partner schools, staff at our third party suppliers, individuals or representatives of organisations who have expressed an interest in our business, and 	Identity data (including full name and title) Contact data (including business address, business email address and business telephone numbers)	To seek or maintain business relationships (including maintaining contacts at schools and other education bodies and maintaining contacts with potential financial education officers, potential donors or potential trustees). To assess the suitability of any supplier or other business relationship, including ongoing monitoring of a relationship.	Legitimate interest: to pursue our charitable aims and to seek supply arrangements appropriate for our business. To perform a contract with you or take steps to enter into such a contract.

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<ul style="list-style-type: none"> anyone else with whom SIFET has contact in a business context 		To negotiate and/or manage the supply of goods or services to us by you or your organisation.	
All data subjects	All personal data	<p>To comply with a legal obligations (such as any legislation or a court order).</p> <p>To protect our privacy, property or safety or those of a third party and your rights do not override such interests.</p> <p>To establish, exercise or defend our legal rights.</p>	<p>To comply with a legal obligation</p> <p>Legitimate interests: to assert our legal rights.</p>

* Although our financial education programme is aimed in particular at school leavers, we do not seek to obtain any personal data relating to any children who participate in our courses.