



Data Privacy Notice

Who we are

The Halifax Foundation for Northern Ireland is one of four independent grant-making trusts, covering England & Wales, Scotland, Northern Ireland and the Channel Islands. We are funded by the profits of Lloyds Banking Group (trading as the Halifax Bank in Northern Ireland) and together receive 0.5% of the Group's pre-tax profits.

The Halifax Foundation for Northern Ireland is an independent charitable foundation and our policies are determined by our own Board of Trustees.

We invest in local charities, empowering communities in greatest need to flourish.

Overview

HFNI recognises that we must protect the personal privacy of individual data subjects whose personal data we may obtain and use to:

- Process applications for funding
- Verify that funding which we have granted has been used for the purposes allocated
- Allow users to enjoy the services available on our website
- Promote the work of HFNI.

Personal data is any information that relates to an individual or entity who can be identified from that data.

Processing means doing anything with your data, such as collecting, recording or holding the data as well as disclosing, destroying or using the data in any way.

This data privacy notice explains what personal data is collected by HFNI through our website and/or grant making activities and how/why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and the supervisory authority in the event you have a complaint.

We will never be intrusive or invasive of your personal privacy, nor will we ask you to provide data that is irrelevant or unnecessary.

We will use strict measures and processes outlined in this and other relevant Halifax Foundation for Northern Ireland policies to ensure that the risk of unauthorised access or disclosure of your personal data is minimised as much as possible.

The personal information we collect and use

In order to process funding applications which we receive we may collect and use personal information relating to you whether direct from you or from the charities who apply for funding at the application stage, for example:

- The personal details of identified Main Contact within the charity in respect of its funding application i.e. full name, role, email address, telephone and mobile number

- The personal details of the Senior Contact (Chairperson) of the charity, or other trustee/board members, i.e. full name, role, address, email address, telephone/mobile number
- Bank statements – these may include details of payments made to and received from individuals
- Board meeting minutes – these may include details of individual trustees/board members and others present

To verify funding granted has been appropriately used for the purposes it was allocated for, we may collect and use personal information relating to you direct from the charities who we grant funding to.

Where we have granted funding towards an employee's salary, we may require verification that the funding has been so used and of the salary by way of access to:

- The relevant payroll record for the employee for the grant period
- The payslips of the employee(s) for the grant period
- The timesheets of the employee(s) (if supported by a number of funders)
- Bank statements showing the wages being paid out from the charity to the employee(s)

Where we have granted funding, we may require verification of the payments which have been made with our grant by way of the following documents and which may necessarily result in our obtaining personal information relating to you:

- Invoices for payments made confirming the date (which must include the name and address of the supplier)
- Mileage and/or Expenses claim forms for Volunteer/Staff expenses (which must include the name of the relevant volunteer/staff and details of their claim)

We may also obtain and use personal information obtained direct from you if you opt in to our communications when applying for a grant or if you otherwise email admin@halifaxfoundationni.org to have your details added to our communications. (Please see Future Contact Opt-In Statement section below).

We may also obtain and use personal information by way of photographs of you whether from HFNI, a charity we are funding, a PR Company, or from you direct, provided your consent has been obtained.

Purpose and Lawful Basis for Processing your Data

Legitimate Interests

We rely on our legitimate interests as the main lawful basis on which we collect and use personal data. Our legitimate interests are facilitating the delivery of our funding programmes and promoting the work of the HFNI.

Any personal data of charity representatives and which is obtained as part of the funding application and/or funding verification processes will be used to support the grant assessment process, to notify your organisation of the outcome of the grant application to the charity, to monitor the grant to the charity and to fulfil the evaluation requirements of the charity's grant, should their application be successful.

Any personal data of staff, volunteers and/or suppliers of the charities to whom we provide funding and which is obtained as part of the funding verification process will be used to monitor and verify the charities use of the grant and to fulfil the evaluation requirements of the charity's grant.

Consent

We will rely on consent as the lawful basis on which we collect and use personal data obtained directly from you for the purpose of opting into our communications and/or in the event that we propose to

use a photograph of you for the purposes of promoting the work of Halifax Foundation for Northern Ireland.

The personal data which we collect will be used only for the purposes specified.

How long do we keep your data

Funding applications and grants - any personal data obtained will be held on our database and will be kept for a period of 10 years from date of application. Any additional information provided in support of a funding application/evaluation, is attached to the grant management system and retained for the same period. This period is in line with Lloyds Banking Group's retention policy. Lloyds Banking Group are the sole donor of HFNI. After a period of 10 years, your personal data will be removed from the grant management system. Details of the grant will be maintained, to highlight the grant relationship with the charity.

Communications - we may hold the contact details which have provided for the duration of the HFNI retention period.

Photographs - we may hold photographs of you (together with your name) for the duration of HFNI retention period.

In accordance with your data protection rights, you have the right to request that we erase your personal data if it is no longer necessary in relation to the purposes for which it was collected or processed. Where your personal data was obtained by consent, you have the right to withdraw consent at any time.

Keeping your personal information secure

We are responsible for the safe storage and use of the personal information which we process. We will keep your personal information up to date and store it securely. We confirm that we have technical measures in place to protect it from loss, misuse, unauthorized access or disclosure and not collect or retain excessive amounts of personal data.

Appropriate safety measures are in place to ensure your personal data remains secure and is only used for the purpose intended. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are required to do so.

Fraud Prevention

If you apply for a grant or receive a grant from us, we may undertake checks for the purposes of preventing fraud. These checks require us to process personal data you have provided about you and your charity office bearers and data we have received from third parties.

We and fraud prevention agencies may also enable law enforcement agencies, regulators, Government, and other funders to access and use your personal data to prevent crime.

Others with whom we may share your personal information:

- The trustees of HFNI
- Our legal advisors, accountants and auditors
- Our IT grant system software provider may also have access to your data in consequence of the services which they provide to us

- Law enforcement or other authorities where required by law

We will not share your personal information with any other third party.

GDPR (General Data Protection Regulations)

Under GDPR, you have the right to:

- Fair processing of information and transparency over how we use your personal information
- Access your personal data and to certain supplementary information that this Privacy Notice is designed to address
- Require us to correct any mistakes in your information which we hold
- Have your personal data expunged from our database if we no longer need it for the purpose we collected it. For example, if during the assessment process, we would require an alternative main contact/senior contact in order to process the application for funding
- Object at any time to the processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or significantly affect you
- Object in certain circumstances to our continued processing of your personal information
- Otherwise restrict our processing of your personal information in certain circumstances
- Withdraw consent at any time (see below)
- Make a complaint with a supervisory authority, which in the UK is the ICO

For further information on each of those rights, including the circumstances in which they apply, please see the ICO's website at www.ico.org.uk.

To exercise your personal data rights and/or, to make a complaint about our use of your data or for any further information, please contact Brenda McMullan at brenda@halifaxfoundationni.org or alternatively, by writing to Brenda McMullan, Chief Executive, at Clifton House, 2nd Floor, 2 North Queen St, Belfast BT15 1ES marked as 'confidential'. Such requests will be dealt with within one calendar month.

We hope that we can resolve any query or concern which you raise about our use of your personal information. Alternatively, you can contact the Information Commissioner's Officer on 0303 123 1114 or visit their website at www.ico.org.uk.

Future Contact Opt-In Statement

If you would like us to keep you up to date about the work of HFNI and any other items we think would be of interest to your work, you can easily opt-in to our communications on your application for funding. You may also email admin@halifaxfoundationni.org to request to have your details added to our communications.

You can change your mind at any time by emailing admin@halifaxfoundationni.org to have your details removed.

We value your privacy. We'll never share your data with others without your permission and we'll only use it for the purposes we've outlined and you've agreed to. By submitting your wish to opt in, you agree that we may process your information in accordance with these terms.

Cookies

We use a technology called "cookies" as part of a normal business procedure to streamline the functionality of our website. A cookie is an element of data that our website sends to your web browser

which is then stored on your system. The website also uses cookies to perform anonymous analysis and reporting on usage which we use to improve our website content to better serve our clients.

Staff

All Foundation staff and trustees have completed GDPR Training, which is updated annually.