



FINANCIAL MARKET POLICIES FOUNDATION (“FMPF”)

PRIVACY POLICY

INTRODUCTION

The introduction of the EU’s General Data Protection Regulation (GDPR) and the new British Data Protection Bill, that will replace the Data Protection Act 1998 (the “Act”) and is currently passing through Parliament, will ensure that the collection and dissemination of personal data is more tightly controlled. FMPF will only use the information that we collect about individuals lawfully and in accordance with the GDPR and the Act.

FMPF is committed to safeguarding the privacy of its donors and beneficiaries.

OVERVIEW

We are an incorporated company, registered as a charity, which receives occasional donations from institutions and individuals. We make grants to institutions in fulfilment of our Charitable Objects. We collect information at the time when those two activities occur.

This Privacy Policy Notice sets out the basis on which any personal data we collect from you, or you provide to us, might be held and used - “processed” by us. It is therefore intended that FMPF complies with the Act and GDPR when eligible to do so, which may change over time; and by adhering to policies and procedures to achieve exemption from registering with the Information Commissioner’s Office.

Exemption from registration is achieved by not storing ‘personal data’ either on a computer system, or on an organised manual filing system which will thus also have the effect of denying any ease of access to the information. And by deleting any records other than for the purpose of conforming to legal obligations laid down by the Government.

RETENTION OF PERSONAL DATA.

We will retain your personal data only in order to meet legal obligations:

- Individual Donors. To the end of the financial year following that in which the donation is received, during which a gift aid claim to HMRC will be made if appropriate.
- Individual Beneficiaries. Until the grant terms have been met.

Financial Market Policies Foundation
c/o Kreston Reeves LLP
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Horsham
West Sussex
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We are obliged to keep relevant records, which may override the above, for tax and legal reasons for seven years, after which they can and will be destroyed by us.

FOR THE AVOIDANCE OF DOUBT:

FMPF does not actively use the data we have and as long as that situation exists we remain unaffected by the terms of the Act and GDPR.

The Data Controller. FMPF is, from a legal perspective, classed as the ‘Data Controller’.

Data Protection Officer (DPO). FMPF has not appointed a DPO. Queries concerning FMPF’s data processing should be addressed to the Chairman of Trustees, at the registered office address shown in this Notice.

Purpose of Processing Personal Data. We collect personal data only to process a donation into our accounts and to consider an application for a grant and its possible award, with payment out of our accounts.

Lawful Basis of Processing Personal Data The lawful basis of processing personal data is as follows:

Consent.

An individual donor will be registered for the processing of your personal data and the amount of your donation into our accounting system. We will ask for your consent to be given on our Data Consent Form signed at the time of making the donation if we should like to contact you in the future for any other reason.

An individual beneficiary will be registered for the processing of your personal data, based upon your Consent to receive the grant. The awarding of the grant may take place within the terms of a grant agreement.

Family/Friend Personal Data. If we wish to hold personal data about a family member or friend of a beneficiary, we will ask for consent from the individual for this.

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Other.

In respect of Privacy, if we should hold your email address and phone number, which count as “personal information”, we promise to take good care of this information, and make every effort to hold it securely.

Categories of Personal Data Processed. The information we hold should be accurate and up-to-date. The personal information which we hold will be held securely in accordance with our internal data protection and security policies.

The type or categories of personal data that we may collect about you includes your name, postal address, email address, mobile and/or landline number. Equally minutes of meetings and records of decisions may include your name and other information about you.

Category of Recipients of Personal Data. Your name and contact details will only be used internally within FMPPF.

Sensitive Personal Data. We will never collect sensitive personal data about grant applicants and grantees without your explicit consent and a clear explanation why it is required.

Sale or Passing of Personal Data to Third Parties. We will not sell or pass your personal data to any commercial or charitable organization during the periods that we might hold it.

Marketing purposes. We do not contact supporters or grantees for marketing purposes.

Website cookies. We do not use cookies on our website.

Email contacts. We do not store personal ‘contact’ details with email addresses.

Data Subject’s Rights. Under the Act and in even more so under the GDPR you have a number of Rights. You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and you have the right to obtain confirmation that your data is being processed (held), access to your personal data (a copy) and to request and reuse your personal data for your own purposes across different services.

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Right of Erasure. You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten*'. However, you do have a right to have personal data erased and to prevent processing in specific circumstances (where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed, when you withdraw consent, when you object to the processing and there is no overriding legitimate interest for continuing the processing, when the personal data was unlawfully processed and when the personal data has to be erased in order to comply with a legal obligation). Under the Act, you have a right to '*block*' or suppress processing of personal data. The restriction of processing under the GDPR is similar. When processing is restricted, we are permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.

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