

Privacy Notice

We regard the lawful and correct treatment of your personal information as very important and are fully committed to the principles of data protection, as set out in the General Data Protection Regulation (GDPR) which comes into effect on 25 May, 2018.

Dunhill Medical Trust is a registered charity with charity number 1140372, registered company number 07472301 and registered office address 5th Floor, 6 New Bridge Street, London, EC4V 6AB.

1. Why do we have this notice?

Our privacy notice will help you understand what information we collect, how we use it, how we protect any information that you give us, and what choices you have.

A quick note on terminology: when we use the words “we”, “us”, or “our” in this notice, it refers to the Dunhill Medical Trust only.

‘Personal data’ means data which can be used to identify an individual and includes information about that individual.

2. What are our lawful bases for processing data?

We process personal data in connection with our charitable activities.

The General Data Protection Regulation sets out a number of bases on which we may rely for legal processing of data. We use the lawful bases of ‘consent’, ‘contract’ and ‘legitimate interests’.

[Grant applicants, registrants for news, events and updates, suppliers and consultants](#)

We use ‘consent’ as the lawful basis for processing your personal data in relation to the grant application process and for sending you information about our news and activities. This means you need to agree to us processing your details in order that the application can proceed, and in some circumstances, to information relating to the application being sent outside the European Economic Area. Those circumstances relate to some grant schemes for academic and clinical researchers, where peer review forms part of our grant assessment procedure. You will be advised when making your application if this is the case.

We also use ‘consent’ as the lawful basis for processing your personal data where you have registered your contact details on our Grants Management System or via the Contact Us form on our website and requested that we send you updates about our news and events.

Should a grant application you make to us be successful, we will then rely on the lawful basis that processing is necessary for the performance of the contract with you which will be made with you to enable both us and you to fulfil the obligations relating to the grant award. Similarly, if we enter into a contract with you as a supplier or consultant, we will rely on the lawful basis that processing is necessary for the performance of the contract.

The 'Legitimate interests' lawful basis is used for all other aspects of our work. This means the interests of our organisation in conducting and managing our activities in a way that you would reasonably expect, with a minimal privacy impact, and taking into account your rights and interests. For example, for grant-holders, once the obligations of a grant award have been fulfilled, we will retain the information contained in the application for statistical purposes, as set out in the section below on data retention periods. For suppliers and consultants (or potential holders of these capacities), we will retain the contact information you provide to us and use it to contact you in pursuit of our day-to-day activities.

Employees and job applicants

We will use the "Legitimate interests" lawful basis to process your application to us. This means the interests of our organisation in conducting and managing our activities in a way that you would reasonably expect, with a minimal privacy impact, and taking into account your rights and interests.

Once you accept an offer of employment, we will then rely on the contract lawful basis which will be made with you to enable both us and you to fulfil the obligations relating to the employment.

Trustees, committee members (and applicants for those positions) or peer reviewers

We will use the "Legitimate interests" lawful basis in our dealings with you. This means the interests of our organisation in conducting and managing our activities in a way that you would reasonably expect, with a minimal privacy impact, and taking into account your rights and interests.

3. What personal data might we hold about you?

Grant applicants and grant holders

The personal data we hold about you includes:

- Your full name and honorifics
- Your job title
- The name and address of the organisation you work for or are associated with
- Your email address – in most instances this will be an organisational email address
- Your telephone number – again, in most instances this will be an organisational telephone number
- Current and previous job titles and employers
- Educational qualifications
- Any further information you choose to supply to us in a *curriculum vitae*, including your date of birth

We store this information securely, either on our own systems, or for grant applications/records, on our Grant Management System, provided by [Fluent Technology](#). We make every effort to ensure the information is kept up to date. All of our staff take responsibility for doing so and have been trained in the principles of data protection. You are also encouraged to review the information we hold on you and to tell us if it needs updating or correction.

Grant holders and applicants are able to [update their details directly via the Grant Management System](#). However, we will also amend your record for you if you tell us that your details have changed (and we can verify your identity) by emailing admin@dunhillmedical.org.uk. You can unsubscribe from any mailing you receive from us via the software service we use for the purpose by clicking “unsubscribe”. If you would like us to delete your record, we will do this if you let us know.

Your personal data is stored and used only for the intended purpose, and we take steps to collect only the minimum personal data necessary for that purpose.

[Registrants for information, news and updates from the Trust, suppliers and consultants](#)

The personal data we hold about you includes:

- Your full name
- Your email address. In most instances this will be an organisational email address

You can unsubscribe from any mailing you receive from us via the software service we use for the purpose by clicking “unsubscribe”. If you would like us to delete your record, we will do this if you let us know.

Your personal data is stored and used only for the intended purpose, and we take steps to collect only the minimum personal data necessary for that purpose.

[Employees and job applicants](#)

We will hold information that you supply to us as part of your recruitment as an employee and in order to ensure that you are paid. This information will be treated in confidence and in accordance with the principles of the GDPR.

The personal data we hold on you as a job applicant includes:

- Your full name and honorifics
- Your job title
- Your home address
- Personal contact details – telephone/mobile numbers and/or personal email address
- Current and previous job titles and employers
- Educational qualifications and copies of original certificates
- Any further information you choose to supply to us in a *curriculum vitae*
- Bank account details (if you have claimed travel expenses)

Once you become an employee, we will also hold:

- Contact details of next-of-kin or other emergency contact (telephone/mobile numbers and/or personal email address)
- Copies of identification documents (with photographic identification) such as passport or driving licence
- Gender
- Marital status
- Bank account details
- Data we are required to hold by Her Majesty's Revenue and Customs
- National Insurance number
- Date of birth
- Any health records and disability information you have chosen to provide
- Pension fund arrangements
- Appraisal records gathered in the course of your employment with us.

We store this information securely on our own systems. Some information will also be stored, under agreement, with our accountants for payroll purposes. This information is kept as up-to-date as possible – employees are responsible for informing the Executive Director of any changes in their personal data.

Your personal data is held only in relation to your employment with us and will not be used for other purposes.

[Trustees, committee members \(and applicants for those positions\) or peer reviewers](#)

We will hold information that you supply to us as part of your recruitment as a Trustee or committee member and in order to ensure that you receive reimbursement of your expenses. This information will be treated in confidence and in accordance with the principles of the GDPR.

The personal data we hold on you as a Trustee or committee member or applicant to those positions includes:

- Your full name and honorifics
- Your job title
- Your home address
- Personal contact details – telephone/mobile numbers and/or personal email address
- Current and previous job titles and employers
- Educational qualifications
- Any further information you choose to supply to us in a *curriculum vitae*
- Bank account details (if you have claimed travel expenses)

Once you are appointed as a Trustee or committee member, we will also hold:

- Date of birth
- Copies of identification documents (with photographic identification) such as passport or driving licence.

In the case of peer reviewers, we will hold only full name and a publicly available email address in order to contact you in the first instance. We will gather these from university websites. If you agree to become a peer reviewer, we will ask you to provide:

- Your full name and honorifics
- Your job title
- The name and address of the organisation you work for or are associated with
- Your email address – in most instances this will be an organisational email address
- Your telephone number – again, in most instances this will be an organisational telephone number

Your personal data is stored and used only for the intended purpose, and we take steps to collect only the minimum personal data necessary for that purpose.

4. How do we use your information?

Grant applicants and grant holders

We access and use the information as necessary and in accordance with your instructions:

- To provide you with news and information about our work, events and grants programme, if you have chosen to receive it. You can change your preferences as to whether you receive this information at any time.
- To support you on a funding programme, including to access the funds agreed relating to a grant award and to meet the reporting obligations relating to the award.
- To personalise and customise your experience with our website.
- To communicate with you, including by email, post or telephone.
- To verify your identity and position.
- To investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity.

We do not undertake any automated decision-making in our processing of personal data.

Peer reviewers, registrants for information, news and updates from the Trust, suppliers and consultants

We access and use the information to provide you with news and information on the Trust's work, events and grants programmes, if you have chosen to receive it. You can change your preferences as to whether you receive this information at any time.

In the case of peer reviewers, we will use the information to contact you about applications you are reviewing for us or to contact you regarding new applications you might agree to review for us.

In the case of suppliers and consultants, we will access and use the contact information with which you provide us in pursuit of the work for which we have engaged you.

We do not undertake any automated decision-making in our processing of personal data.

Employees and job applicants

We access and use the information as necessary for the purposes of:

- Assessing your job application to us.
- Administering the payroll and reimbursing expenses.
- Administering pension contributions.
- Ongoing management.
- Health and safety.
- To communicate with you, including by email, post or telephone.
- As required by law and regulation, for example, making statutory returns to Her Majesty's Revenue and Customs.

We do not undertake any automated decision-making in our processing of your personal data.

Trustees and committee members and applicants for those positions

We access and use the information as necessary for the purposes of:

- Assessing your application to us.
- Reimbursing your expenses, in accordance with our policy.
- Confirming your identity.
- As required by law and regulation, for example, making statutory returns to Companies House and the Charity Commission.
- Enabling you to process and approve payments on behalf of the Trust.
- To communicate with you, including by email, post or telephone.

We do not undertake any automated decision-making in our processing of your personal data.

5. What other information could we hold?

We may also hold:

- **Payment and other financial information:** we will only hold bank details for institutions/organisations for the purposes of making grant-related or other contractual payments, but may hold individuals' personal bank account details for reimbursement of expenses, as per our expenses policy for trustees, committee members and other individuals, as agreed with us. These will be held on our secure on-line banking system and on our accounting systems, Xero and ReceiptBank. These latter two systems are also accessible by our accountants and our auditors with whom we have suitable agreements to ensure confidentiality. We will only hold such financial information for as long

as necessary, for example, until the final payment of a grant has been made, and in line with legal requirements.

- **Surveys and interviews:** from time to time, we may conduct surveys and interviews with individuals and organisations from the sector. We will explain any specific implications as part of the activity, should they differ from this privacy notice.

6. How long do we hold information?

We will hold personal information only for as long as necessary for the stated purpose(s), and in line with any legal, accounting or reporting requirements, for example, in relation to financial information.

If you have simply asked us to keep you informed of our news, events and other information, we will retain your name and email address until you request us not to.

Full details regarding the retention periods for the various categories of data we hold may be [found here](#).

7. How do we protect the security of your information?

We take data security seriously. We are [Cyber Essentials](#) certified. We take all reasonable steps to protect the information you provide to us from loss, misuse, and unauthorised access, alteration or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology, and include firewalls, passwords, secure servers and encryptions of financial transactions. Our own servers and those of our Grants Management Portal provider, [Fluent Technology](#), are currently based in the UK.

While we will use the email facility provided by our Grants Management System for routine communications with grant holders and grant applicants regarding an application or the ongoing management of a grant, you should be aware, whether you are a grant applicant, grant holder, employee, trustee, committee member or other individual who has chosen to receive notification of funding opportunities, news or events from the Trust, that we may transfer your name and email address to other mailing services such as Microsoft's Outlook, [MailerLite](#) or JISC. [JiscMail](#) is the UK's national academic mailing list service, which helps people working in the UK education and research sectors to discuss, debate, collaborate and communicate with peers, experts and partners using mailing lists. Its privacy notice is available [here](#). MailerLite is a service which enables us to design and send email newsletters. [Its security statement may be found here](#).

As set out in the section above on other data we may hold about you, where we hold personal bank account details, these are stored on our secure on-line banking system and on our accounting systems, [Xero](#) and ReceiptBank. Xero's servers are outside of the European Economic Area and has certified agreements in place with each of its hosting providers to satisfy the requirements relating to the transfer of data from the

EU to the US. Receipt Bank stores its data on servers based inside the European Economic Area.

On occasion, we may also send you surveys to complete, which may involve you providing your name and contact details, using a service called Smart Survey which uses only UK/EU-based servers that store personally identifiable information in a secure environment.

If you change your mind about receiving this more general information about our work, you may "unsubscribe" from this service by either amending your preferences in My Contact Details in the Grants Management System (if you are a grant applicant or grant holder) or, if you have registered via our website to receive information, news and updates, by clicking on the unsubscribe link at the bottom of any email newsletter you receive from us, or by simply contacting us at admin@dunhillmedical.org.uk.

8. When can we share and disclose your information?

Grant applicants and grant holders

It is not our policy to share the information described here with other organisations for commercial gain. We may share information with others, however, for the following reasons:

- **With peer reviewers:** We subscribe to the Association of Medical Research Charities' Principles of Peer Review, so research grant applications will be subject to peer review. This may include sending information outside of the European Economic Area (EEA) to international peer reviewers.
- **With third party service providers and agents:** As set out in our policy on protecting the security of your data, we may engage external organisations to process information on our behalf. Additionally, for grant schemes for academic and clinical researchers, we will send information to Europe PMC and for statistical purposes to the Association of Medical Research Charities. Data relating to Community grants will be passed to 360 Giving, an organisation which provides support for funders to publish their grants data openly. This activity is licensed under the Creative Commons Attribution 4.0 International License, which means that the data are freely accessible to anyone to be used and shared as they wish.
- **To comply with laws:** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety:** To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.

Peer reviewers, registrants for information, news and updates from the Trust, suppliers and consultants

We do not, under normal circumstances, share information with other organisations, however, if you have registered for an event, may share the data you have provided with third party organisations involved in facilitating the event for that purpose only.

For suppliers or consultants, we may share information with others as follows:

- **To comply with laws:** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety:** To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.

Employees and job applicants

We do not, under normal circumstances, share information with other organisations except where outlined above in relation to payroll and pensions. However, we may share information with others as follows:

- **To comply with laws:** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety:** To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.
- **To facilitate salary and expenses payments to you:** our accounting systems, [Xero](#) and [ReceiptBank are](#) also accessible by our accountants, Kingston Smith, with whom we have a suitable agreement to ensure confidentiality.

Trustees and committee members and applicants for those positions

We do not, under normal circumstances, share information with other organisations. However, we may share information with others as follows:

- **To comply with laws:** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety:** To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.
- **To facilitate making expenses payments to you:** our accounting systems, [Xero](#) and [ReceiptBank are](#) also accessible by our accountants, Kingston Smith, with whom we have a suitable agreement to ensure confidentiality.
- **To enable you to make payments on the Trust's behalf** via its bank, C. Hoare and Co. (Trustees only).

9. Your rights in relation to our processing of your personal data

The Dunhill Medical Trust is defined by the General Data Protection Regulation as a 'data controller' which means that we are responsible for how and why personal data is used. Our Administration & Governance Officer can help you with any queries about the information in this privacy notice or the information we hold about you. She can be contacted on shirley.jones@dunhillmedical.org.uk or 020 7403 3299.

- You have the right to be informed about what we are doing with your personal information. We do this by providing you with this privacy notice.
- You have the right to object to the processing of your personal information where we are relying on the legitimate interests lawful basis.
- You have the right to request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- If the personal information we hold about you is incorrect or out of date you can ask us to correct it.
- You have the right to ask us to delete the information that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you ask us to delete your personal information we will not be able to provide our services to you.
- You have the right to ask us to restrict how we use your personal information for a period of time if you claim that it is inaccurate and we want to verify the position, or if our processing is unlawful but you do not want us to erase your personal information, or for some other limited circumstances. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. If you ask us to restrict our use of your personal information, we may not be able to provide you with our services.
- You can also ask us to send another organisation information that you have provided to us in a format that can be read by computer.
- Where we rely on consent to process your personal information you have the right to withdraw that consent.

You can ask to exercise these rights by emailing admin@dunhillmedical.org.uk.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

Alternatively:

- if you have created an account on our Grants Management System, you can amend your personal data or update your contact preferences yourself by logging in to the portal and going to My Contact Details;
- if you have requested updates via the sign up form on our website, you can click to unsubscribe from messages we have previously sent, or simply [contact us](#).

10. How do you report a concern about how we have used your data?

If you feel we haven't handled your data properly, please do contact us and we will do everything we can to rectify the problem.

If you feel this doesn't go far enough, or if you want to report your concern elsewhere, you can contact the Information Commissioner's Office:
<https://ico.org.uk/concerns/>.

11. What is our cookie policy?

Like many other organisations, we use cookies on our website to collect information about how people use the site and which pages are the most popular. This helps us make improvements to the website.

Cookies are small text files sent by us to your computer and from your computer or mobile device to us each time you visit our website. Cookies do not identify the individual user, just the computer used.

We use the following cookies:

- [Google Analytics](#). A cookie called **collect**, classified as a "marketing cookie", enables us to get information about how you use the website. The cookies send that information (including your IP address) to Google who stores it on servers in the United States. Google uses that information to evaluate your use of the website and to produce reports on website activity. Google will not associate your IP address with any other data held by Google.
- A cookie called **lang**, classified as a "preference cookie" enables our website to "remember" information about the way it should look or behave, so, for example, if you have stated a preferred language or regional base, it will remember this.

In addition, our website uses a range of linked software and websites which will employ their own cookies. You should review those sites' individual cookie policies. If you choose to review our report and accounts online, for example, you will be transferred to a website called [Flipsnack](#) which enables you to view them in a "flipping book" format. Flipsnack employs the following cookies to enable it to do so and you should review its [privacy policy](#) for more details:

Statistics cookies:

- **_ga and _gid**. These register a unique ID that is used to generate statistical information about how you use the website.
- **_gat**. Used by Google analytics to limit the number of requests that can be made by a user (in order to maintain performance).

Marketing cookies:

- **r/collect** collects data to measure efficiency of viewed or clicked ads and shows targeted advertisements.

Unclassified cookies:

- **_asc** and **_auc** are analytics cookies used to track and report information to the Alexa analytics service
- **_atrk.gif** is a pixel tracker.

There is also a direct [Twitter](#) feed on the front page of our website. Twitter will have its own [cookies and cookie policy](#).

You can allow or disallow the use of cookies on your computer/device. You can block our cookies altogether by selecting the appropriate settings in your browser (visit <https://www.aboutcookies.org> for more information). However, please remember that if you do this you may not be able to use the full functionality of this website.

12. Changes to this Privacy Notice

We may change this notice from time to time. If we do, we will post any changes on this page. If you continue to use the services after those changes are in effect, you will be asked to agree to the revised notice.

If you have any questions about anything contained in this notice, please contact us at admin@dunhillmedical.org.uk.