
PRIVACY POLICY

BACKGROUND:

This privacy policy sets out how The PH Holt Foundation, and in its capacity as sole Corporate Trustee of the Holt Education Trust, uses and protects any information you provide whilst using our [website](#).

The PH Holt Foundation understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://phholtfoundation.org.uk> (“our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Site. If you do not accept and agree with this Privacy Policy, you must stop using our Site immediately.

The PH Holt Foundation may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from May 2018.

Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

- “**We/Us/Our**” means PH Holt Foundation incorporating the Holt Education Trust [a registered charity, number 1113708, and company limited by guarantee in England and Wales under company number 05731598, whose registered address is 151 Dale Street, Liverpool, L2 2AH. ICO Registration No: ZA073782]
- “**Cookie**” means a small text file placed on your computer or device by our Site when you visit certain parts of our Site and/or when you use certain features of our Site. Details of the Cookies used by our Site are set out in the section About Cookies;
- “**Cookie Law**” means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
- “**personal data**” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via our Site. This definition shall, where applicable, incorporate the definitions provided in the [Data Protection Act 1998], [EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”)];

Information About Us

For the purposes of the Data Protection Act 1998, and under the General Data Protection Regulations due to come in force on 25th May 2018, the Data Controller is The PH Holt Foundation, 151 Dale Street, Liverpool, L2 2AH. Our nominated representative is Anne Edwards and can be contacted by email at administrator@phholtfoundation.org.uk by telephone on 0151 237 2663 or by post at the registered address above.

What Does This Policy Cover?

Personal information submitted to us via this website or directly via email or post will be used for the purposes specified in this privacy statement or in relevant parts of the website. This Privacy Policy applies only to your use of our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data.
- The right of access to the personal data we hold about you.
- The right to rectification if any of your personal data is inaccurate or incomplete.
- The right to be forgotten - i.e. the right to ask us to delete any personal data we hold about you.

PH Holt Foundation Registered Office: 151 Dale Street Liverpool L2 2AH | Registered Charity Number:1113708 Registered Company Limited by Guarantee in England and Wales No: 05731598

- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation).
- The right to object to us using your personal data for particular purposes.
- The right to prevent processing for direct marketing; we confirm we do not engage in direct marketing.
- The right to object to decisions being taken by automated means; we confirm we make no decisions on you using an automated process and profiling.

If you have any cause for complaint about our use of your personal data, please write to us by email at administrator@pholtfoundation.org.uk or by post to 151 Dale Street, Liverpool, L2 2AH and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or +44 1625 545 745

Personal Data Collection

Depending upon your use of our Site, we may collect some or all of the following personal [and non-personal] data (see also the section on About Cookies).

- Information that you provide by filling in forms on our site such as name and organisation, email and/or postal address and telephone numbers.
- Information about your visits to and use of this website which may include your IP address, geographical location, browser type and version, entry and exit page, length of visit, number of page views, route taken through this website and similar information.
- Information that you provide to us when applying for a grant or any other information you choose to send us. We will use this information only for the purposes of assessing your application, managing or monitoring any grant awarded, related administration or research purposes, and for sharing relevant information to other funding organisations to use in their own assessment of applications and managing or monitoring of grants awarded.

How We Use Your Data

We will only use your personal information for the purpose for which it was given and will not keep it for longer than necessary. We will comply with our obligations and safeguard your rights under the GDPR at all times. Our use of your personal data will always have a lawful basis, either because it is necessary for our service to you, because you have consented to our use, or in the legitimate interests of the Charity such as:

- Supplying our services to you including providing information you have requested.
- Internal record keeping for administrative, governance and grant making purposes.
- Replying to emails from you or to send you non-marketing communications.
- Analysing your use of our Site to enable us to improve your experience.
- Fulfilling statutory obligations.
- For compliance with legal obligations, in this case to provide full and accurate information to the Charity Commission and Companies House concerning the Trustees and Directors of the Foundation.
- We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the [Data Protection Act 1998], [GDPR] and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- Third parties (charities showcased by the Foundation and social media sites such as Twitter) whose links appear on our Site may use third party Cookies. If you click a function on our website that is associated with these parties (e.g. to share or tweet information, view information or a video) they will place cookies on your computer. We do not take responsibility for these cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

Data Storage

We only keep your personal data for as long as we need to for the purposes described above in and/or for as long as we have your permission to keep it. We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. Data we collect from our Site will only be stored in the UK. All other information you provide to us is stored on our secure cloud based services including Office 365 and Dropbox. This data is protected using password management tools and encryption.

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Information provided through grant applications may be retained for up to 7 years for our compliance with legal and statutory obligations.

Sharing of Data

Your information will not be shared with third parties unless you have previously been informed, for example, on an application form, or as is required by law, such as with HMRC, or with the police for the detection or prevention of crime. This may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

We may disclose information about you to any of our employees, Trustees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this Privacy Policy. We currently reserve the right to pass information provided to us by applicants to other Trusts and Foundations.

We may also compile statistics about the use of our Site including data on traffic, usage patterns, user numbers, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you.

Cross-border Data Transfers

Information that the PH Holt Foundation collects may be stored and processed in and transferred between any of the countries in the EU in accordance with this privacy statement. In addition, personal information that you submit for publication on the website will be published on the internet and may be available around the world.

Your Right to Withhold Information

You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data. You may restrict our use of Cookies.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

How to Access Your Data

You have the right to ask for a copy of any of your personal data held by us (where such data is held), and we will provide any and all information in response to your request free of charge. Please contact us for more details at administrator@phholtfoundation.org.uk or using our registered contact details.

By using our website, you agree to this Policy and you consent to our use of cookies in accordance with the terms of this Policy.

About Cookies

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Cookies do not contain any information that personally identifies you or give access to your computer.

There are two main kinds of cookies: “session” cookies and “persistent” cookies. Session cookies only last for the duration of users using the website and are deleted from your computer when you close your browser, whereas persistent cookies outlast user sessions and remain stored on your computer until deleted, or until they reach their expiry date.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer using your browser’s anonymous usage setting (called “Incognito” in Chrome, “InPrivate” for Internet Explorer, “Private Browsing” in Firefox and Safari etc.)

First and third party cookies

First party cookies are cookies that we control and place on your device. Third party cookies are cookies that another party controls but are placed on your device when you visit our site. For example, we use Google Analytics cookies to gather information about the user experience on our website.

Cookies on this Website

Name of Cookie	Provider	Purpose
CookieLawInfoConsent	https://phholtfoundation.org	CookieYes sets this cookie to record the default button state of the corresponding category and the status of CCPA. It works only in coordination with the primary cookie.
cookieLawInfo-checkbox-necessary	https://phholtfoundation.org	Set by the GDPR Cookie Consent plugin, this cookie records the user consent for the cookies in the "Necessary" category.
cookieLawInfo-checkbox-functional	https://phholtfoundation.org	The GDPR Cookie Consent plugin sets the cookie to record the user consent for the cookies in the category "Functional".
cookieLawInfo-checkbox-performance	https://phholtfoundation.org	Set by the GDPR Cookie Consent plugin, this cookie stores the user consent for cookies in the category "Performance".
cookieLawInfo-checkbox-analytics	https://phholtfoundation.org	Set by the GDPR Cookie Consent plugin, this cookie records the user consent for the cookies in the "Analytics" category.
cookieLawInfo-checkbox-advertisement	https://phholtfoundation.org	Set by the GDPR Cookie Consent plugin, this cookie records the user consent for the cookies in the "Advertisement" category.
cookieLawInfo-checkbox-others	https://phholtfoundation.org	Set by the GDPR Cookie Consent plugin, this cookie stores user consent for cookies in the category "Others".
wpEmojiSettingsSupports	https://phholtfoundation.org	WordPress sets this cookie when a user interacts with emojis on a WordPress site. It helps determine if the user's browser can display emojis properly.

Google Analytics

We do however use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. Details captured during your visit will include, but are not limited to, traffic data, location data, weblogs and other communication data and the resources you access. All data collected is anonymous and will not identify you as an individual. Google, not The PH Holt Foundation, stores this activity information, and you can view Google's privacy policy on their www.google.com/privacypolicy.html

The following third-party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
ga*	Google Analytics	Google Analytics sets this cookie to store and count page views.
_ga	Google Analytics	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.

To opt out of being tracked by Google Analytics across all websites visit their [website](#).

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

Contacting Us

If you have any questions about our Site or this Privacy Policy, please contact us by email at administrator@phholtfoundation.org.uk by telephone on 0151 237 2663 or by post at: 151 Dale Street, Liverpool, L2 2AH. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up to date.

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