

# **PRIVACY POLICY**

## **MARCH 2025**

### **1. BACKGROUND**

The PH Holt Foundation supports a wide range of projects to help create a better future for the people of Merseyside.

The PH Holt Foundation understands that your privacy is important to you and that you care about how your personal information is collected and used.

The PH Holt Foundation respects and values the privacy of everyone who provides us with their personal information or visits this website, <https://phholtfoundation.org.uk> (“our Site”) and will only collect and use personal information in ways that are described here, and in a manner that is consistent with our obligations and your rights under the applicable Data Protection legislation.

This Privacy Policy sets out how the PH Holt Foundation, in its capacity as sole Corporate Trustee of the Holt Education Trust, uses and protects the information you provide whilst using our services, including when you apply for a grant, or you participate in an event, or visit our [website](#). Please read this Privacy Policy carefully and ensure that you understand it.

### **2. INFORMATION ABOUT WHO WE ARE**

The PH Holt Foundation, incorporating the Holt Education Trust, (“**we**”, “**us**”, or “**our**”) is a registered charity, number 1113708, and company limited by guarantee in England and Wales under company number 05731598.

We will be the controller of your personal information unless otherwise stated.

We are based at:

4th Floor, LCVS Building,  
151 Dale Street,  
Liverpool,  
L2 2AH.

You can contact us at:

**Email:** [administrator@phholtfoundation.org.uk](mailto:administrator@phholtfoundation.org.uk)

**Telephone:** [0151 237 2663](tel:01512372663)

We are registered with the Information Commissioners Office (“ICO”) under registration no: ZA073782.

### **3. CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Please check back frequently to see any updates or changes to our Privacy Policy.

### **4. THIRD-PARTY LINKS**

Our Site may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or policies.

When you leave our Site we encourage you to read the Privacy Policy of every website you visit.

### **5. WHAT DOES THIS POLICY COVER?**

This Privacy Policy covers our collection, use and processing of personal information. Personal information or personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Personal information may include your name, email address, postal address, phone number, your IP address, or other personal information that you provide to us when applying for a grant, subscribing to our newsletter, contacting us via email, social media or contacting us through our contact forms.

Personal information submitted to us will be used for the purposes specified in this Privacy Policy.

### **6. PERSONAL INFORMATION COLLECTION**

We use different methods to collect information from and about you. We collect personal information to provide you with services. We also collect personal information when you visit our Site, contact us by email or via social media or in another way provide us with your personal information.

The categories of personal information we may collect, use, store, and transfer about you, are as follows:

- **Identity data**, which includes your name, organisation. We may also collect your job title, professional qualifications, organisational or institutional affiliations, or publications;
- **Contact data**, which includes postal address, your location, telephone numbers (including mobile numbers) and email address;
- **Special category personal data**, also known as sensitive personal data, which includes information about your race, religion or physical or mental health, and health conditions;
- **Grant data**, which includes all information, including financial information, that you provide to us when applying for a grant or any other information you choose to send us.

- **Technical Data**, includes internet protocol (IP) address, your login data, 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 this website.
- **Usage Data**, includes information about how you use our Site, and services.
- **Marketing and communications data**, includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **other publicly available personal information**, including any which you have shared via a public platform (such as a Insta, X or public Facebook page).

We will use the information you provide for the purposes of assessing your grant 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.

We may need to collect additional data for the purposes set out in this Privacy Policy.

## **7. HOW WE USE YOUR DATA**

The law on data protection sets out a number of different reasons for which a company may collect and process your personal information. We will only use your personal information when the law allows us to do so.

Examples of why we may use the information we collect includes:

- Supplying our services to you including providing information you have requested.
- To assess and process grant applications.
- To manage and / or monitor awarded grants.
- Internal record keeping for administrative, governance and grant making purposes.
- To communication with you, including communications about your application, funding or replying to emails from you or to send you non-marketing communications.
- To notify you about events.
- To ensure health and safety during events.
- For research purposes.
- Analysing your use of our Site to enable us to improve your experience.
- Fulfilling our 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 only use your personal information for the purpose for which it was given and will not keep it for longer than necessary.

Where you provide information to us relating to a third party, for example an employee, your advisers or your suppliers, you are responsible for bringing this privacy policy to their attention at the time of sharing the data with us.

## **8. LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION**

We have carefully considered our use of your personal information and will always ensure that we have a lawful basis.

The lawful basis that we most commonly use to collect and process your personal information are:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

In certain circumstances, we need your personal information to comply with our legal obligations or to pursue our legitimate interests in a way which might be reasonably expected as part of our running of the Foundation. For example, we need to use the information you provide us to enable us to manage and administer a grant application and grant funding.

Whenever you have given us your consent to use your personal information, you have the right to change your mind at any time and withdraw that consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

## **9. IF YOU FAIL TO PROVIDE PERSONAL INFORMATION**

Where we need to collect personal information by law or legitimate interest, and you fail to provide that data when requested, we may not be able to assess or progress your application for grant funding.

## **10. PROFILING AND/OR AUTOMATED DECISION MAKING**

Unless otherwise agreed with you, we will not use any of your personal information for automated decision-making or profiling which has a legal or similar significant effect on you.

## **11. MARKETING**

We strive to provide you with choices regarding certain personal information uses, particularly around marketing.

If you have given your consent to receive marketing emails you can withdraw this at any time, or if we are relying on our legitimate interests to send you marketing you can object. In either case, just let us know. If you have received a direct marketing email from us and no longer wish to do so, the easiest way to let us know is to click on the unsubscribe link at the bottom of our marketing emails.

## **12. DATA STORAGE**

We only keep your personal information 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.

Information provided through grant applications will be retained for at least 7 years for our compliance with our legal and statutory obligations.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for analytical or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **13. DATA SECURITY**

We will comply with our obligations and always safeguard your rights under the data protection legislation.

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.

All information you provide to us will be stored on our secure cloud-based services. Your information is protected using technological controls such as firewalls, user verification, strong data encryption and password management tools.

We have also put in place procedures to deal with any suspected personal information data breach and will notify you and any applicable regulator when we are legally required to do so.

### **14. SHARING OF DATA**

We may disclose information about you to our employees, Trustees, officers, agents, suppliers, or subcontractors as far as reasonably necessary for the purposes as set out in this Privacy Policy. We may also pass information provided to us by applicants to other Trusts and Foundations, managed service providers or other third-party suppliers.

We only ever share your personal information with trusted third parties.

Where personal information is shared with a third party, a managed service provider or other third-party supplier, we work closely with them to ensure that your personal information is secure and protected at all times. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Our contracts with third parties make it clear that they must hold personal information securely, abide by the principles and provisions of data protection rules, and only use information as we instruct them to. In all instances where we disclose your information to third parties, we will ensure that your information is appropriately protected. If we stop using their services, any of your personal information held by them will either be deleted or rendered anonymous.

We may also disclose your personal information to comply with a regulatory or legal duty, or if it is necessary to disclose personal information in connection with an investigation of suspected or actual fraudulent activity or is based on a lawful disclosure request such as from HMRC, or the police for the detection or prevention of crime.

We may also share your personal information, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

We will never sell your personal information to a third party.

### **15. CROSS-BORDER DATA TRANSFERS**

Your personal information will be stored on systems with technical and organisational security measures and controls located within the UK.

Sometimes we will need to share your personal information with third parties and suppliers outside the UK such as Europe.

Where information is stored, processed in and / or transferred between any countries outside of the UK or Europe it will be transferred in accordance with the guiding principles of this Privacy Policy. Any transfer of your personal information will follow applicable laws, with procedures in place to ensure your personal information receives the same protection as if it were being processed inside the UK.

Please note that where you submit personal information for publication on our website it will be published on the internet and may be available around the world.

## 16. YOUR RIGHTS

Under the UK data protection legislation, you have the following rights regarding your personal information:

- **Withdraw your consent:** Where our processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal information for that purpose.
- **Right of Access:** You can request a copy of the personal information we hold about you.
- **Right to Rectification:** You can request that we correct any inaccuracies in your personal information or if the information is out of date or incomplete you can request it be changed. If you notify us that the information we hold is complete or inaccurate we will correct or complete the information as soon as possible.
- **Right to Erasure:** You can request the deletion of your personal information under certain circumstances including where we no longer have a reason for holding your information, you withdraw your consent, or you object to its processing. Following your request, we will erase your information without undue delay unless the continued retention is necessary and permitted by law.
- **Right to Restrict Processing:** You can request that we restrict the processing of your personal information in certain situations. This can be done in circumstances where we need to verify the accuracy of the information, if you do not wish to have the information erased or you have objected to the processing of the information, and we are considering this request. Once the processing is restricted, we will only continue to process your personal information if you consent, or we have another legal basis for doing so.
- **Right to Object:** You can object to our processing of your personal information for direct marketing purposes. In some circumstances you have the right to request that we temporarily stop using your information in a certain way.
- **Right to Data Portability:** You have the right to receive a copy of your personal information which you gave to us. The copy will be provided in a commonly used and machine-readable format. You can also have it transmitted directly from us to another data controller, where technically possible.
- **The right not to be subject to automated decision making and profiling:** You have the right to not be subject to solely automatic decisions (i.e., decisions that are made about you by computer without any human input) in relation to any processes that have a legal or similarly significant effect on you.

You will be notified if we make a solely automated decision which produces a legal effect or significantly affects you.

## **17. WHEN YOU REQUEST TO EXERCISE YOUR RIGHTS**

You will not have to pay a fee to exercise any of the rights listed above. However, we may charge a reasonable fee if your request is clearly unfounded or excessive, including where requests are repetitive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information or to exercise any of your other rights. This is a security measure to ensure that personal information 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.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **18. ABOUT COOKIES**

Cookies are small text files that are placed on your device (e.g., a computer, tablet, smartphone) when you visit our website. Cookies allow a website to recognise your device and store certain information to improve your experience.

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.

### **a. Types of Cookies we use:**

We use the following categories of cookies on our website:

- **Essential Cookies:** These cookies are necessary for the basic functionality of our Site, such as enabling you to navigate and use its features. Without these cookies, services like shopping baskets or e-billing may not work.
- **Performance Cookies:** These cookies collect information about how visitors use our Site, such as which pages they visit most often or if they receive error messages. These cookies help us improve the performance and functionality of our Site.
- **Functional Cookies:** These cookies allow our Site to remember choices you make (such as your username, language preference, or region) to provide a more personalised experience.
- **Targeting and Advertising Cookies:** These cookies are used to deliver ads that are more relevant to you and your interests. They also limit the number of times you see an advertisement and help measure the effectiveness of ad campaigns.
- **Third-Party Cookies:** We may allow trusted third parties to set cookies on our Site for advertising, analytics, and social media purposes. These cookies are governed by the privacy policies of these third parties.

We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers, and other information. All statistical 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.

These are the cookies we use and why:

Name of Cookie	Provider	Purpose
CookieLawInfoConsent	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	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	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	Cookie Consent plugin, this cookie records the user consent for the cookies in the "Necessary" category.
cookieLawInfo-checkbox-functional	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	Cookie Consent plugin sets the cookie to record the user consent for the cookies in the category "Functional".
cookieLawInfo-checkbox-performance	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	Cookie Consent plugin, this cookie stores the user consent for cookies in the category "Performance".
cookieLawInfo-checkbox-analytics	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	Cookie Consent plugin, this cookie records the user consent for the cookies in the "Analytics" category.
cookieLawInfo-checkbox-advertisement	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	Cookie Consent plugin, this cookie records the user consent for the cookies in the "Advertisement" category.
cookieLawInfo-checkbox-others	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	Cookie Consent plugin, this cookie stores user consent for cookies in the category "Others".
wpEmojiSettingsSupports	<a href="https://phholtfoundation.org">https://phholtfoundation.org</a>	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.

### b. Google Analytics

We use Google Analytics to analyse the use of our 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. It will be Google, not The PH Holt Foundation, that stores this activity information, and you can view Google's privacy policy on their [www.google.com/privacypolicy.html](http://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](#).

**c. How to Control Cookies**

You have the right to decide whether to accept cookies. You can set your browser to block cookies, delete cookies, or notify you when a cookie is being placed. Please note that if you choose to block or delete certain cookies, some features of our Site may not work properly.

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.

Third parties may also use cookies, over which we have no control. 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 Site 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.

To deactivate the use of third-party advertising cookies, you may visit the consumer page to manage the use of these types of cookies.

**19. HOW CAN WE HELP?**

If you have any questions about our website or this Privacy Policy, please contact us by email at [administrator@phholtfoundation.org.uk](mailto:administrator@phholtfoundation.org.uk), or by telephone on 0151 237 2663 or by post at: 151 Dale Street, Liverpool, L2 2AH.

For further information on data protection please visit the Information Commissioner Office (ICO) website <https://ico.org.uk/>

The Information Commissioner Office regulates data protection. If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to lodge a complaint with the ICO.

You can contact them by visiting the ICO website or by:

**Post:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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