St Luke's College Foundation
(a Charitable Incorporated Organisation)

Charity 1215436

Data Privacy Policy

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Contents

Section 1: How we use personal information 1
- Visitors to our website 1
- General enquires 2
- Individuals applying for a personal award 2
- Organisations applying for a corporate award 3
- Individuals contacting the Anglican Chaplaincy to the University of Exeter 4
- Employees 4
- Trustees 5
- Suppliers 5
- Consultants & professional advisors 5
- Job applicants 6
- Other grant-giving trusts and foundations 6

Section 2: How we look after your information 6
- Service providers 6

Section 3: Your rights 7
- Right of access 7
- Right of rectification or deletion 7
- Right to withdraw consent 7
- Complaints or queries 7

Section 4: Disclosure of personal information 8
- Changes to this privacy policy 8

Section 5: How to contact us 8

Section 1: How we use personal information[1]

This privacy policy is to let you know how the St Luke's College Foundation ("the Foundation") promises to look after your personal information. It explains how we do this and tells you about your privacy rights and how the law protects you.

In order for us to use your personal information, including sharing it with others, we must have a lawful basis to do so. This will be one or more of:

1. When it is in our **legitimate interest**[2] – for example, in order for us to decide whether to make a personal award and to then administer it we need some information from you.
2. To **fulfil a contract** we have with you – for example, a contract for the supply of goods or services.
3. When you **consent** to it – for example, if you sign up to receive a Chaplaincy newsletter.
4. To fulfil a **legal obligation** – for example, sending our annual accounts to the Charity Commission or making returns to HMRC.

This privacy policy applies to information we collect about:

- Visitors to our website
- General enquiries
- Individual applicants for personal awards
- Organisations applying for a corporate award
- Individuals contacting the Anglican Chaplaincy
- Employees
- Trustees
- Suppliers
- Consultants & professional advisors
- Other grant-giving trusts and foundations
- Job applicants

Visitors to our website

We do not collect information for analysis when someone visits our websites. We do not collect personal information via our websites.

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[1] This policy's first draft was based on the Culham St Gabriel's Trust policy. We are grateful to them for sharing it with us.

[2] The concept of **legitimate interest** is explained in detail in the Information Commissioner's Office (ico.org.uk) publication "Guide to the General Data Protection Regulation (GDPR)". Three tests are identified (a Purpose test, a Necessity test and a Balancing test); these are used by the Foundation to test that it does have a legitimate interest to process personal data for a given purpose. *Purpose* will always relate to the proper business of the Foundation in pursuit of its charitable objectives. The *necessity* test ensures that only data that is necessary is collected and that it is only processed in ways that are consistent with the purpose. The *balancing* test ensures that the Foundation does not override the individual's interest when it collects and processes personal data.

The websites that are owned and run by the Foundation are:
http://www.st-lukes-foundation.org.uk/
http://www.StLukesCF.org.uk/

Cookies
Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work more efficiently, as well as to provide information to the owners of the site. The Foundation's websites do not use cookies.

Links to other websites
This privacy policy does not cover the links within our websites to other websites. We encourage you to read the privacy statements on the other websites you visit.

General enquires

Why we need your data
You may contact us by email, phone or post with an enquiry about an aspect of our work.

What we do with your data
We will use the personal information in the **legitimate interest** of responding to your enquiry. We will not share your data with any other third party without first seeking your explicit consent.

How long we keep your data
We keep your data according to our data retention policy, a copy of which is available upon request.

Individuals applying for a personal award

Why we need your data
When you apply for a personal award from the Foundation, you submit your application via the post or as an email attachment. Applications received by post are scanned and are then processed in the same way as applications received via email. If a personal award is made to you, you will be asked to provide annual progress reports from your tutor and a final report. Any personal information that is provided in the application or after an award is made is used for the **legitimate interest** of evaluating the application and for the ongoing administration and management of the personal award.

What we do with your data
Information in and about your application may be accessed by the Foundation's Trustees, employees and professional advisors where there is a legitimate reason for them to do so.

Personal award holders are named, along with the sum awarded, in the Foundation's Annual Report to the Charity Commission. The Annual Report is a public document.

When you apply for a personal award we may share your first name, surname, postcode, project title, and total amount applied for with the Association of Church College Trusts (ACCT), of which

we are a member. Sharing information between GDPR compliant ACCT members is in the **legitimate interest** of the members and of applicants for the following reasons:

- An ACCT member receiving an application for a grant or award may be aware of another member that may be able to provide a grant or award;
- To ensure that trusts can make award decisions in the light of other award decisions concerning an applicant;
- To support the statistical analysis of awards and grants made by ACCT members, to inform their ongoing work;
- To prevent fraud.

We will not share your data with any other third party without first seeking your explicit consent.

How long we keep your data
We keep your data according to our data retention policy, a copy of which is available upon request.

Organisations applying for a corporate award

Why we need your data
When you apply for a corporate award from the Foundation, you submit your application via email. Any personal information that is provided in the application is used for the **legitimate interest** of reviewing the application and for the ongoing administration and management of any award that is made.

What we do with your data
Information in and about your application may be accessed by the Foundation's Trustees, employees and professional advisors where there is a legitimate reason for them to do so.

Corporate award holders are named, along with the sum awarded, in the Foundations Annual Report to the Charity Commission. A brief description of the purpose of the award may also be included. The Annual Report is a public document.

When you apply for a corporate award we share your first name, surname, organisation, postcode, project title, total amount applied for and years for which applied with the Association of Church College Trusts (ACCT), of which we are a member.

Sharing information between GDPR compliant ACCT members is in the legitimate interest of the members and of applicants for the following reasons:

- An ACCT member receiving an application for a grant or award may be aware of another member that may be able to provide a grant or award;
- To ensure that trusts can make award decisions in the light of other award decisions concerning an applicant;

- To support the statistical analysis of awards and grants made by ACCT members, to inform their ongoing work;
- To prevent fraud.

We will not share your data with any other third party without first seeking your explicit consent.

How long we keep your data
We keep your data according to our data retention policy, a copy of which is available upon request.

Individuals contacting the Anglican Chaplaincy to the University of Exeter
The Foundation is responsible for Anglican Chaplaincy to the University of Exeter. The University provide premises and computer systems to support the work of the Chaplaincy.

Why we need your data
You may contact the Chaplaincy by email, phone or post with an enquiry about any aspect of Chaplaincy or with a request for advice and support.

What we do with your data
We will use any personal information in the legitimate interest of responding to your request or enquiry. This may involve sharing personal information with the University as they provide computer systems for the Anglican Chaplaincy. We will not share your data with any other third party without first seeking your explicit consent unless we have a legal obligation to do so (e.g. a safeguarding matter).

How long we keep your data
We keep your data according to our data retention policy, a copy of which is available upon request. Data held on University computer systems will be held in accordance with the University's data retention policy. This includes all emails sent to and from @exeter.ac.uk email addresses.

Employees
What we do with your data
With your consent, we may display your name, role-related contact details and a photograph in University Chaplaincy related print and web-based media.

In order to administer your pay, tax, national insurance and pension we share information with Exe Valley Payroll services (https://exevalleypayroll.co.uk/) who is our payroll provider. We share information with our pension provider, the Church of England Pensions Board, with our Accountants (Apsleys of Tiverton) and with our bankers (NatWest). In order to fulfil our legal obligation we also share information with HMRC. If you are a member of the Clergy we will share personal information with the Dioceses of Exeter as they have a legitimate interest in your ministry.

If you are a member of the Anglican Chaplaincy Team at the University you will be asked to share personal information with the University so that you can access University facilities. Personal information shared with the University will be managed under University policies and procedures.

How long we keep your data
We keep your data according to our data retention policy. A copy of the policy is available upon request.

Trustees
What we do with your data
Personal information provided by Trustees is submitted to the Charity Commission to meet their requirements. The Charity Commission publishes the names of Trustees (but no more) on the Charity Commission website. The Foundation's Annual Report also contains a list of Trustees. This is a public document that is published on the Charity Commission website.

The Foundation holds other personal information about Trustees for the purposes of communication and to enable expenses to be paid when claimed.

It is occasionally necessary to share Trustee details with its professional advisers when the Foundation has a legitimate interest or other legal justification to do so. That apart, the Foundation will not share personal information with a third party without your express consent.

How long we keep your data
We keep your data according to our data retention policy, a copy of which is available upon request.

Suppliers
What we do with your data
We contract the purchase of goods and services from suppliers. In order to do so we hold personal information such as the names and email addresses of employees of the supplying organisation. The St Luke's College Foundation has a legitimate interest in maintaining contact with our suppliers in order to facilitate our core business and office functions. This information is for our internal use only and will only be shared with your explicit consent.

How long we keep your data
We keep your data according to our data retention policy, a copy of which is available upon request.

Consultants & professional advisors
What we do with your data
We seek the services of consultants and professional advisers to provide services to the St Luke's College Foundation.

In order to pay consultants and professional advisers we share information with NatWest Bank via their online banking service. Transaction details are also recorded in the Foundation's accounting system - QuickBooks Online.

How long we keep your data
We keep your data according to our data retention policy, a copy is available upon request.

Job applicants
What we do with your data
When you apply for a job with the St Luke's College Foundation you provide personal information in relation to the advertised job. Any personal information that is provided on the application is used for the legitimate interest of reviewing your application. Applications are reviewed by a panel drawn from the Foundation's employees and Trustees. Panels may also include members from the University of Exeter and from the Diocese of Exeter.

This information you provide is for the Foundation's internal use only and will only be shared with your explicit consent.

How long we keep your data
We keep your data according to our data retention policy, a copy is available upon request.

Other grant-giving trusts and foundations
Why we need your data
The St Luke's College Foundation works closely with several other grant-giving trusts and foundations. In some cases, we give a link to their website from ours. We hold the email addresses and phone numbers of some staff and trustees. In holding this information, we have a legitimate interest in ensuring close strategic collaboration with other funders, as it helps potential grant applications.

What we do with your data
We will not share your personal data with anyone else without your explicit consent.

How long we keep your data
We keep your data according to our data retention policy, a copy is available upon request.

Section 2: How we look after your information

We take all reasonable steps to keep your data safe. All information you provide to us is stored on computers which are password protected or on secure cloud based systems. Onsite backups of local computer systems are password protected; offsite backups are password protected and encrypted.

Service providers
In addition to locally held information, the St Luke's College Foundation uses trusted companies and organisations to hold personal information on the Foundation's behalf. These are:

- NatWest Bank: NatWest provide banking services to the Foundation and consequently hold any personal information that is required to support that function.
- Quickbooks Online (https://quickbooks.intuit.com/uk/): The Foundation uses Quickbooks Online (a cloud based service) to hold its accounting records. The accounting records include personal information.
- Microsoft Office 365 including OneDrive: The Foundation uses OneDrive (Microsoft's secure cloud storage area) as a location for storing personal information.

Section 3: Your rights

Under the Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.

Right of access

The St Luke's College Foundation tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to us for any personal information we may hold you need to put the request in writing to Revd Chris Martin, Director, St Luke's College Foundation, The Vicarage, School Hill, Stoke Gabriel, Totnes, Devon, TQ9 6QX or by emailing director@stlukescf.org.uk

Right of rectification or deletion

If we do hold information about you, you can ask us to correct any mistakes or delete any information by contacting us in writing to Revd Chris Martin, Director, St Luke's College Foundation, The Vicarage, School Hill, Stoke Gabriel, Totnes, Devon, TQ9 6QX or by emailing director@stlukescf.org.uk

Right to withdraw consent

If you no longer want to receive communications from the Foundation you may ask us to remove you details from our records. We will do this unless there is a legally justified reason not to do so.

Complaints or queries

The St Luke's College Foundation tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We will also take steps to help those who

wish to make complaints about we use their personal information. We will acknowledge complaints within 30 days and respond without undue delay.[3]

If you want to make a complaint about the way we have processed your personal information, you can contact Revd Chris Martin, Director, St Luke's College Foundation, The Vicarage, School Hill, Stoke Gabriel, Totnes, Devon, TQ9 6QX or by emailing director@stlukescf.org.uk

If you are not satisfied with the way in which we have handled your compliant you can raise your concern with the Information Commissioners Office at https://ico.org.uk/concerns/

Section 4: Disclosure of personal information

The St Luke's College Foundation Trust will not sell your personal information to any outside organisation. Your information may however be shared with regular contractors or suppliers only under our direct contract, only if necessary as detailed in this policy, and with confidentiality assured.

If required to do so by law, the St Luke's College Foundation will disclose personal information.

Changes to this privacy policy

We keep our privacy policy under regular review. The front page shows the date of the last update.

Section 5: How to contact us

If you want to request information about our privacy policy, you can email us at director@st-lukes-foundation.org.uk or write to:

Revd Chris Martin, *Director*
St Luke's College Foundation
The Vicarage,
School Hill,
Stoke Gabriel,
Totnes
DEVON TQ9 6QX

[3] In accordance with the Data Use and Access Act 2025