

## Privacy Policy

### Introduction

The Badur Foundation (the “**Foundation**”, “**us**” or “**we**”) is a charitable foundation that aims to tackle poverty through education, social enterprise and innovative technologies. We find people and projects focused on helping marginalised and disadvantaged individuals and groups who want to improve their future prospects and those of their communities. The Foundation operates in the UK, Laos and Hungary.

The Foundation’s website (<http://www.badurfoundation.org/>) (the “**website**”) is owned and operated by the Foundation, a company registered in England and Wales with company number (07657300), registered charity number (1142413), and registered address of The Harley Building, 79 New Cavendish Street, London, W1W 6XB.

The Foundation is committed to protecting and respecting your privacy. This policy (together with any documents referred to in it) sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following information carefully to understand our practices regarding your personal information and how we will treat it.

Our privacy policy is a detailed guide to how we use your information. It sets out our approach to how we handle your personal information in the following areas:

- 1. How to contact us**
- 2. Sources of information we may collect from you**
- 3. Current and former grant recipients**
- 4. Foundation contacts**
- 5. Event delegates**
- 6. Images (including photographs and videos)**
- 7. Audit and regulatory requirements**
- 8. Disclosure of your personal information**
- 9. International data transfers**
- 10. Your privacy rights and choices**
- 11. Making a data protection complaint**
- 12. Links to third party websites**
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#### 1. How to contact us

If you have any questions about this policy or how we use your personal information, please contact us by one of the following means:

- Email [contact-us@badurfoundation.org](mailto:contact-us@badurfoundation.org)
- Call +44 (0) 20 7317 7365; or
- Write to The Harley Building, 79 New Cavendish Street, W1W 6XB.

#### 2. Sources of information we may collect from you

We may hold personal information relating to you from a number of sources and will collect such information from you in the following ways:

- (a) When you provide it **directly**. For example:
- your submitting a proposal or application to us;
  - your request for information;
  - your contacting us with enquiries or other correspondence.

- (b) When you **visit our Website**:

When someone visits <http://www.badurfoundation.org> we automatically collect:

- (i) Technical information, including IP address. This is statistical data about our user's browsing actions and patterns, and does not identify any individual.
- (ii) Information about your visit to the Website, including how you came to the Website and the pages you viewed and interacted with.

We use cookies on our Website in order to make the Website work more efficiently as well as provide information on the use of the site. The cookies collect information in an anonymous form, including the number of visitors, where visitors have come to the Website from and the pages they visited.

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, or work more efficiently, as well as to provide information to the owners of the site. The information below explains the cookies we use and why.

#### Google Analytics

These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited. Read Google's overview of [privacy and safeguarding data](#).

To find information relating to how to manage cookies on popular browsers, please visit the browser developer's website. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

### 3. Current and former grant recipients

The Foundation funds a small number of projects which are identified through our networks, relationships and research. We seek to be a proactive funder and do not accept unsolicited applications. We will only ask for as much information as we need to effectively consider a grant proposal, to manage a grant if you are successful and to monitor its progress. In submitting a proposal to the Foundation you are agreeing to us processing your data for these purposes and in the ways outlined in this section.

Grants data is stored on the Foundation's servers, accessible by Foundation employees.

If your proposal is unsuccessful we will keep a record of your contact details for up to 10 years to enable us to maintain records of your history should you apply again. If your proposal is successful we will keep your data for the lifetime of the grant plus up to 10 years to enable us to meet any regulatory and reporting requirements, including HMRC investigations. In addition to proposal data, we will retain any personal data related to the administration or operation of the grant. After this

time, we will only retain the name of grant recipients and the amount awarded and some basic details of the grant made for archiving and research purposes.

For some of our projects, we may use partners or consultants to assist us with the management process, including training, evaluation and research activities. These are often partner organisations or individuals and we will ensure an agreement which meets the standards of GDPR is in place.

Information regarding grants awarded is published on the Foundation's website and in its annual accounts which are submitted to Companies House and the Charity Commission. This will often include the title and description of the grant, name of the recipient or organisation, date of the award, its duration and the amount awarded. We will not publish address details of individuals who are awarded grants except where these are also the registered addresses of organisations we fund. If you use a personal address for an organisation and do not wish us to publish this information you must inform us as the point of grant award. We may also include this information on grants awarded in presentations about the Foundation's work.

There may be times we share information with a third party organisation such as a charity or other funder who may contact us for a reference. Most information will be organisational and not personal, but at times personal data (for example the names of senior staff) may be included. This is a legitimate interest as it will improve funding in the sectors we support.

#### 4. Foundation contacts

We collect personal data from Foundation contacts to enable us to undertake the legitimate activities of the Foundation, including those who have expressed an interest in working with us. This data will be held for up to 10 years or for as long as the ongoing relationship is in operation to enable us to contact you if necessary.

#### 5. Event delegates

If you attend a Foundation event, we will hold relevant personal data in order to deliver this event. This may include sensitive personal data about personal circumstances or needs which may be shared with those who deliver aspects of the event (e.g. dietary requirements for caterers).

All event attendees may be listed on the delegate list that may be shared with other delegates and event partners such as the venue. In agreeing to attend the event you are confirming your agreement to us using your details in this way.

Data regarding event attendees may be stored as electronic documents on the Foundation's servers, accessible by Foundation employees.

We will only keep this data for as long as we need to deliver the event and up to 1 year after the event to enable us to complete any follow up administration.

#### 6. Images (including photographs and videos)

The Foundation may use images (including photographs and videos), which may be taken by us or submitted by those we work with, to illustrate the work of the Foundation and the projects we support. These may involve personal data which we collect as part of the legitimate activities of the Foundation. Images may be stored on the Foundation's server or hosted on the website and/or via YouTube. Images may also be used in printed and internet publications, and on social media.

The Foundation will not permit images (including photographs and videos) to be taken without prior consent. Participants have the right to withdraw their consent by following the instructions given. *Please see the Foundation's safeguarding policy for further information.*

The Foundation may also showcase images produced by third parties such as grantees or partners that we work with to promote the work that we support through our communication channels. In doing so, we will make every effort to ensure suitable permissions and compliance with GDPR are satisfied before use of the images.

#### 7. Audit and regulatory requirements

We may share any data about the operation of the Foundation with the Foundation's auditors, the HMRC, the Charity Commission, the Information Commissioner's Office, Companies House and other regulatory bodies should this be necessary to complete statutory audit and regulatory requirements.

#### 8. Disclosure of your personal information

The personal information we hold about you will be provided to our staff and Trustees who require it in connection with our work and services, and may be provided to selected third party suppliers but only where they provide sufficient guarantees and agree only to use the information under our instructions.

We also reserve the right to disclose your personal information to third parties:

- (a) with our professional advisors e.g. lawyers, where necessary to protect our interests;
- (b) if we are under any legal or regulatory obligation to do so; and
- (c) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

Otherwise we will generally ask for your consent before we share your personal information with a third party unless otherwise permitted by law.

#### 9. International data transfers

As we sometimes use third parties to process personal information (for example, website hosts), it is possible that your personal information may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). Please note that certain countries outside of the UK or EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred, stored and/or otherwise processed outside the UK or EEA in a country which does not offer an equivalent standard to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards to protect your information. If you have any questions about the transfer of your personal information, please contact us using the details in [section 1](#) of this privacy notice.

#### 10. Your privacy rights and choices

Where we rely on your consent, you have the right to **withdraw your consent at any time**. When we use your personal information you have the right to:

- Ask us for **confirmation** of what personal information we hold about you, and to **request access** to a copy of that information. If we are satisfied that you have a right to see this personal information, and we are able to confirm your identity, we will provide you with this personal information.
- Request that we **erase** the personal information we hold about you, as far as we are legally required to do so.
- Ask that we **correct** any personal information that we hold about you which you believe to be inaccurate.
- **Object** to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; or (ii) use the personal information for research purposes.
- Ask for the provision of your personal information in a machine-readable format (the **data portability** right) to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means.
- Ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate usage.

#### 11. Making a data protection complaint

Please note that if you are not satisfied with the way we handle your complaint, **you are entitled to raise a complaint directly with a relevant data protection authority** in the country where you are located, including in the UK, the Information Commissioner's Office (ICO) - <https://ico.org.uk/make-a-complaint/>.

You can exercise these rights by using the contact details in section 1 of this notice.

If the UK leaves the European Union (EU):

- If you are located in the UK, you may still raise a complaint with the ICO; and
- If you are located in the EU/EEA, you can find the details of relevant data protection regulatory authorities in other EU countries on the European Data Protection Board (EDPB) website at - [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

#### 12. Links to third party websites

The Website may, from time to time, contain links to third party websites (such as grantees and partner organisations). If you follow a link to any of these websites, please note that these websites have their own privacy policies and that **we do not accept any responsibility or liability for these policies**. Please check these policies before you submit any personal data to these third party websites.

#### 13. Changes to the privacy policy

This privacy policy was last updated on 28 February 2019. We reserve the right to amend this privacy policy in which case we shall share it on the Website. If we make any significant changes to this policy and it is reasonably possible for us to do so, we will contact you directly with more information.