



THE BLACK HEART FOUNDATION

PRIVACY NOTICE

This Privacy Notice explains how **The Black Heart Foundation** (“the Foundation”, “we”, “us” or “our”) collects, uses, stores and protects personal data.

It applies to individuals whose personal data we process including, but not limited to:

- Scholars and scholarship applicants
- Grant applicants and recipients
- Donors, supporters and volunteers
- Partners, stakeholders and suppliers
- Individuals who contact or interact with us (online or offline)
- Users of our website

This notice should be read alongside any specific privacy information provided at the point we collect personal data (for example on application or donation forms). Our website is not intended to directly collect personal data from individuals under the age of 18, and we do not knowingly collect data from under 18’s via the website.

DATA CONTROLLER AND GOVERNANCE

Data Controller: The Black Heart Foundation (UK) Ltd

We are responsible for deciding how and why personal data is processed. We have appointed a **Data Privacy Officer (DPO)** to oversee compliance with data protection law and our internal GDPR policies. The contact details are as follows:

Data Privacy Officer: Executive Manager

Email: info@blackheartfoundation.org

Postal address:

Black Heart Foundation

PO Box 7789

London, W1A 6PW

You also have the right to complain to the **Information Commissioner’s Office (ICO)**, the UK’s data protection

authority. We encourage you to contact us first so we can address any concerns.

OUR DATA PROTECTION COMMITMENT

We process personal data in accordance with the UK GDPR and Data Protection Act 2018. This means personal data is:

- Processed lawfully, fairly and transparently
- Collected for specified, legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept only as long as necessary
- Protected using appropriate technical and organisational security measures

All trustees, staff, volunteers and partners who process personal data on our behalf are required to comply with our GDPR policies, procedures and training requirements.

THE PERSONAL DATA WE COLLECT

We only collect personal data that is necessary for our purposes. Depending on your relationship with us, we may collect the following categories of personal data:

- **Identity Data** – name, title, date of birth, gender
- **Contact Data** – postal address, email address, telephone number
- **Application & Programme Data** – scholarship or grant information, participation data, progress information
- **Financial Data** – donation details, Gift Aid information, payment records
- **Profile Data** – preferences, interests, feedback, survey responses
- **Marketing & Communications Data** – communication preferences, consent records
- **Technical & Usage Data** – IP address, browser type, cookies, website interaction data

We may also create **Aggregated or Anonymised Data** for reporting and impact measurement. This data does not identify individuals.

Special Category Data

We do not routinely collect special category (sensitive) data via our website. Where such data is required (for example to support safeguarding or access needs), it will be processed lawfully, with appropriate

safeguards and transparency.

HOW WE COLLECT PERSONAL DATA

We collect personal data through:

- **Direct interactions** – applications, donations, enquiries, events, correspondence
- **Automated technologies** – cookies and website analytics
- **Third parties** – service providers, publicly available sources, or partners where appropriate

HOW WE USE PERSONAL DATA AND LAWFUL BASES

We only process personal data where permitted by law. The lawful bases we rely on include:

- **Performance of a contract** (e.g. scholarship administration)
- **Legal obligation** (e.g. financial and regulatory reporting)
- **Legitimate interests** (e.g. managing our charitable activities, improving services, fundraising)
- **Consent** (e.g. direct marketing communications)

We will explain the lawful basis at the point of collection where required. Where consent is used, you may withdraw it at any time.

MARKETING COMMUNICATIONS

We may send you information about our work, events or fundraising activities where you have requested information, applied for a programme, or made a donation, where you have opted in/given consent.

You can opt out of marketing communications at any time by clicking unsubscribe links or contacting us via info@blackheartfoundation.org. Consent withdrawals are recorded across our systems and applied promptly.

DATA SHARING

We only share personal data where necessary and lawful.

Trusted Partners and Service Providers

We may share personal data with carefully selected third-party service providers (such as IT, professional advisers, auditors, or payment processors). These parties act only on our instructions, are subject to confidentiality obligations and may not use data for their own purposes

Data Sharing with Tristan Capital Partners

We may share limited, non-sensitive personal data with **Tristan Capital Partners** to support joint operational, reporting, compliance and administrative activities, including where we share a physical office location. Such sharing is governed by a formal Data Sharing Agreement and is limited to defined, legitimate purposes. It prohibits onward sharing without consent and requires appropriate technical and organisational security measures.

INTERNATIONAL TRANSFERS

We do **not currently transfer personal data outside the UK**. If international transfers become necessary, we will ensure appropriate safeguards are in place, including:

- Adequacy decisions
- Contractual clauses
- Data Protection Impact Assessments (DPIAs)
- Explicit consent where required

This Privacy Notice will be updated if such transfers occur.

DATA SECURITY AND BREACH MANAGEMENT

We have implemented appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access or disclosure. Access to personal data is restricted to individuals with a genuine business need. We maintain internal procedures for detecting, investigating and reporting personal data breaches. Where required by law, we will notify the the Information Commissioner's Office (ICO) and Affected individuals

DATA RETENTION

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, regulatory, accounting or reporting obligations. Retention periods are defined and documented, reviewed regularly and supported by secure deletion or anonymisation procedures. Some financial and regulatory records must be retained for 6 years after engagement has ended.

YOUR RIGHTS

You have the right to:

- Request access to your personal data
- Request correction of inaccurate or incomplete data
- Request erasure of your data (where applicable)
- Object to processing based on legitimate interests or direct marketing
- Request restriction of processing
- Request data portability
- Withdraw consent at any time

Requests can be made by contacting the Data Privacy Officer. We will usually respond within one month.

CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice to reflect changes in law, our activities or internal policies. The latest version will always be available on our website and from our Data Privacy Officer.

If you have any questions about this Privacy Notice or how we handle personal data, please contact:

info@blackheartfoundation.org