

Privacy Notice for the Martingale Foundation applications

1. Introduction

- 1.1. This privacy notice sets out how Martingale may collect and use your personal data in relation to any Martingale Postgraduate Foundation applications.
- 1.2. Please also note that "**processing**" shall refer to the collection, recording, storage, use, disclosure and generally any other uses, form of operations or dealings with personal data that we have.
- 1.3. This privacy notice was last updated on 21.08.2024. We may need to make changes to this privacy notice, for example, to include legislation changes, new technologies or other developments in privacy laws. You should check our website periodically to view our most up to date privacy notice.

2. Who processes your personal data?

- 2.1. The Martingale Postgraduate Foundation ("**Martingale**", "**we**", "**our**", or "**us**") is part of Purposeful Ventures ("**PV**") which is a registered charity (number 1204622) whose registered office is at The Yellow Building, 1 Nicholas Road, London, W11 4AN. Please note that references in this policy to "the project" and "scholarship programme" may refer to any and all activities carried out by Martingale in relation to the Martingale Postgraduate Foundation applications only.
- 2.2. If you have any questions about this privacy notice, please send an email to hello@martingale.foundation. Please use the subject line 'Martingale: Privacy Notice'.
- 2.3. All personal data is held in compliance with UK Data Protection legislation: the UK GDPR and the Data Protection Act 2018 (together referred to as "**Data Protection Legislation**").

3. How do we collect your personal data?

- 3.1. We obtain your personal data:
 - 3.1.1. from you, for example when you:
 - 3.1.1.1. provide it to us directly;
 - 3.1.1.2. apply for a Martingale scholarship;
 - 3.1.1.3. contact us for example about your application or scholarship, or otherwise; or
 - 3.1.1.4. through our direct engagement with you, for example when you attend an event;
 - 3.1.2. (if you are successful in receiving a scholarship) in the course of delivering the funding for your scholarship and ancillary activities relating to your scholarship (including, for example, through cohort and network building events);
 - 3.1.3. from third parties, in particular the university or universities to which you have applied or enrolled on a course, and our funders. When personal data is collected by third party organisations directly from you and shared with us, you should be informed at the point of collection by those third parties that your personal data may be shared with us and combined with personal data collected from multiple sources (unless that third party is exempted from such a requirement). You should also be informed of the purposes for which that personal data is going to be used.

4. What type of personal data do we collect?

- 4.1. The personal data we collect might include:
 - 4.1.1. your name;
 - 4.1.2. your contact details (including address, email address and telephone number);
 - 4.1.3. your date of birth;
 - 4.1.4. your past and present academic attainment history;
 - 4.1.5. your past and present employment history;
 - 4.1.6. any information which you provide in an application to a partner university including funding information;

- 4.1.7. details of your economic and social identity, such as whether your parents attended university, what type of school you attended, whether you received free school meals or similar non-protected measures;
 - 4.1.8. your financial information, including your bank details;
 - 4.1.9. details about your family, your personal and/or family circumstances and next of kin contact information; and
 - 4.1.10. photos of you;
 - 4.1.11. answers to application questions and surveys such as details about career aspirations and/or opportunities.
 - 4.2. Some of the personal data that we may collect is known as special category data. This means that the personal data collected is more sensitive than other types of personal data and therefore needs more protection. Special category information is information about your race, ethnic origin, political belief, religious belief, trade union membership, genetics, biometrics, health, sex life and sexual orientation.
 - 4.3. We will typically collect the following special category data about you:
 - 4.3.1. personal data revealing racial or ethnic origin;
 - 4.3.2. personal data revealing your health and disability including learning difficulty or neurodivergence; and
 - 4.3.3. personal data concerning a person's gender, gender reassignment or sexual orientation.
 - 4.4. Where we need to collect personal data by law and you do not provide us with that information, then we may not be able to perform the services that you require and in some cases we may not be able to uphold a scholarship offer.
 - 4.5. In addition, we use aggregated data to generate and publish statistics and reports to stakeholders, partners and interested parties. This may include special category data. These statistics will not include any information that could personally identify you.
5. How do we use the personal data of third parties?
- 5.1. When applying for a scholarship or (if successful) during the receipt of your scholarship, you may provide us with personal data relating to third parties (e.g. family members, next of kin, etc.). Please inform such individuals about our processing and refer them to this privacy notice and obtain any relevant consents.
6. How do we use your personal data?
- 6.1. We process your personal data to enable us to run our scholarship programme and this includes the processing purposes listed below. In doing that, your personal data may be used by us (including our staff) and disclosed to third parties (including the third parties from whom we receive your personal data as noted above).
 - 6.2. For each of the purposes we have set out the legal bases upon which we use and share your personal data in the table below. Data Protection Legislation requires companies to have a "lawful basis" to collect and use personal data. We rely on the following 'lawful bases' when processing your personal data:
 - 6.2.1. it is necessary for legitimate business interests pursued by us or a third party and your interests and fundamental rights do not override those interests. In each case we will always consider your interests and undertake a balancing exercise to ensure that our business interest does not cause you harm or override your own interests;
 - 6.2.2. it is necessary to comply with our legal obligations; and/or
 - 6.2.3. in limited circumstances, where you have given consent, for example when you register for an event.
 - 6.3. We need to have a further processing condition when we process your special category data and we will rely on the following:

6.3.1. in limited circumstances, we need your explicit written consent; or

6.3.2. on the basis that it is necessary to establish, exercise or defend legal claims.

	Purpose for processing your personal data	Legal basis
6.4.	Process and consider your funding and scholarship application	<p>This is in our legitimate interests in order to enable us to operate the scholarship programme you have applied to or we have your consent.</p> <p>Where the information that we are processing is special category data, we obtain your explicit consent. Note that the selection process will consider information disclosed by applicants where outlining 'extenuating circumstances' in 'Part A: About Me', this may require considering specific protected characteristics if voluntarily shared by applicants. Data collected in the 'Equality Monitoring Questions' section will be used for monitoring purposes only.</p>
6.5.	Communicate with you about your funding application and your application to one or more of our partner universities	This is in our legitimate interests in order to enable us to communicate with you effectively about your application.
6.6.	If you are successful in receiving a scholarship, process and provide to the partner university the agreed funding relevant to your course	This is in our legitimate interests in order to provide funding to the partner university in support of your scholarship.
6.7.	If you are successful in receiving a scholarship, carry out our obligations in relation to the project with the relevant partner university	This is in our legitimate interests in order to enable us to undertake the necessary engagement with partner universities to support the provision of funding to you.
6.8.	Communicate with third parties, including our partner universities and funders about the project including your academic progress and attainment	This is in our legitimate interests in order to assess and evaluate the effectiveness of the scholarship programme.
6.9.	Communicate with third parties, including our funders, about receipt and use of the funding	This is in our legitimate interests in order to administer the scholarship programme.
6.10.	Communicate with third parties, including your next of kin, partner university and other relevant parties as required, in order to support you during your postgraduate degree	<p>This is in our legitimate interests to provide support and guidance to you.</p> <p>Where the information that we are processing is special category data, we may process that information where we obtain your explicit consent.</p>
6.11.	Seek your views and comments on our scholarship assessment and delivery	This is in our legitimate interests in order to improve the scholarship programme.

	Purpose for processing your personal data	Legal basis
6.12.	Notify you of changes to our scholarship assessment and delivery	This is in our legitimate interests in order to provide our services.
6.13.	Send you communications that you have requested e.g. updates on your applications, information regarding the Martingale programme and relevant opportunities.	This is in both our legitimate interests in order to ensure that we provide you with appropriate information you require.
6.14.	Process and respond to your requests and enquiries	This is in our legitimate interests in order to provide our services. Where the information that we are processing is special category data, we may process that information where we obtain your explicit consent.
6.15.	Register you for an event we are running and communicate with you about it	This is in our legitimate interests in order to invite you to events or we have your consent.
6.16.	Monitor our scholarship assessment and delivery	This is in both our legitimate interests in order to ensure that we provide you with the most appropriate and timely advice and support.
6.17.	Ensure we monitor our activities and provision of our scholarship assessment and delivery to ensure they support and uphold the principles of equity, diversity, and inclusion	This is in our legitimate interests because it furthers our aims, objectives and business. Where this information is special category data, we may process that information on the basis that it is in the public interest to ensure equality of opportunity or treatment.
6.18.	To manage a dispute, appeal, or complaint	This is in our legitimate interests in order to handle and assist with any complaints you may have. This is also to comply with our legal obligations (in the event of a legal dispute or appeal). Where the information is special category data, we may process that special category data on the basis that it is necessary to establish, exercise or defend legal claims.
6.19.	To comply with any legal or regulatory obligations and in doing so, will need to disclose your personal data to third parties, including relevant regulators and our professional advisors (including our lawyers)	This is to comply with our legal obligations. Where the information is special category data, we may process that special category data on the basis that it is necessary to establish, exercise or defend legal claims.
6.20.	Subject to you providing consent, share your experience of our services with us for us to share with the general public / for marketing purposes	This personal data would be collected on the basis of consent. You are free to refuse or withdraw your consent at any time. Refusing or withdrawing consent will not impact upon your relationship with us or the support you receive.

6.21. Only authorised employees and data processors (software suppliers and those working on behalf of Martingale to deliver our products and services) will have access to your data. All parties who have access to your data are required to process/use that data in accordance with the provisions of current data protection legislation and PV's Data Protection Policy.

7. Who may we disclose your personal data to?

7.1. We may disclose your personal data to third parties as follows:

7.1.1. With our partner universities, to assess you as a candidate against our respective eligibility and entry requirements and to communicate with you about the outcome of those assessments.

7.1.2. If you are successful in being awarded a scholarship, with our partner universities, to provide ongoing support to you throughout your course in furtherance of the project and to monitor the ongoing success of the project.

7.1.3. With appropriate third-party organisations such as an independent evaluation consultant for research, monitoring and evaluation purposes.

7.1.4. With Higher Education Access Tracker ("**HEAT**") and STROBE. HEAT is a national service used by over 50 universities across the country to track students' progression from school into Higher Education and beyond. HEAT helps determine if programmes are successful and beneficial to the people we work with. STROBE is a UCAS service that tracks individuals into the UCAS applications system, and reports anonymously on their outcomes or characteristics at aggregate levels. Much like HEAT, this information can be useful to help determine the impact of programmes.

7.1.5. With other third party suppliers such as Beacon Apps Ltd ("**Beacon**") to externally evaluate our programme in the furtherance of the programme and organisation. Martingale uses Beacon to assist with our recruitment process. We use Beacon to process personal data as a data processor on our behalf.

7.1.6. With our funders, in relation to the progress and outcomes of the project they have funded. Please note that only your contact details will be shared with funders. While we do provide funders with information to report on applications and applicant enquiries, this is only provided as aggregated data.

7.1.7. With our governance members, to discuss, report on and assess the progress and outcomes of the project.

7.1.8. In the event that we transfer the business of Martingale to another entity, we will disclose your personal data to the prospective other party.

7.1.9. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the agreements concerning you.

7.2. In disclosing your personal data in line with the list above, your data may be combined with other data collected from multiple sources.

8. Storage and retention of your personal data

8.1. Personal data is processed using a combination of cloud-based information management systems, cloud storage and sharing facilities, on local file servers and in paper copies. In accordance with Data Protection Legislation it is only retained for as long as is necessary to fulfil the purposes for which it was obtained, and not kept indefinitely.

8.2. We have a data retention policy that sets out how long personal data is kept for, for example we will retain your application for five years and any personal data that we have collected about you for seven years after you finish your Scholarship. We also aggregate and anonymise personal data (e.g., to provide to funders) and this data is kept indefinitely.

9. Transfers of personal data outside of the UK

9.1. We do not normally transfer your information to a country outside of the UK or the European Economic Area ("**EEA**"). However, some of our external third-party support partners are based outside the UK and EEA so their processing of personal data will involve a transfer of personal data outside the UK and EEA.

9.2. Whenever we transfer personal data out of the UK and EEA, we ensure a similar degree of protection is afforded to that personal data by ensuring at least one of the following safeguards is implemented, including:

9.2.1. We will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government; or

9.2.2. Where we use certain service providers, we will implement the necessary specific contractual clauses approved by the ICO which give personal data the same protection it has in the UK.

10. How can you access and update your personal data?

10.1. You can request a copy of the personal data we have about you at any time and we will provide you with a full copy within one calendar month. Occasionally it may 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 within one month and keep you updated.

10.2. We will normally provide a copy of your personal data free of charge, however we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, in these circumstances, we may refuse to comply with your request.

10.3. If you change any of your contact details, and would like these to be updated on our system, please email hello@martingale.foundation.

10.4. In certain circumstances you can withdraw consent at any time for your data to be processed and used by Martingale. In this situation we will advise you of the implications of this.

11. How do we protect your personal data?

11.1. We take the protection of your personal data seriously.

11.2. We have implemented and will take appropriate technical and organisational (including administrative and physical) measures to keep your personal data confidential and secure from unauthorised access, use and disclosure in accordance with our internal policies and procedures covering the storage, transfer, disclosure of and access to personal data.

12. What are your rights with regards to your personal data that we hold?

12.1. Data subjects have the right to do the following with regards to their own data:

12.1.1. Ask us for a copy of the information we have about you. This is called a 'subject access request'.

12.1.2. Ask us to correct any information we have about you if you think it is wrong.

12.1.3. Ask us to erase information about you (although we may have good reasons why we cannot do this).

12.1.4. Ask us to limit what we are doing with your information.

12.1.5. Object to what we are doing with your information.

12.1.6. Ask us to transfer your information to another organisation in a format that makes it easy for them to use.

12.2. If you make a subject access request, and if we do hold information about you, we will, unless an exemption applies which prevents us from doing so:

12.2.1. Give you a description of it.

12.2.2. Tell you why we are holding and processing it, and how long we will keep it for.

12.2.3. Explain where we got it from, if not from you.

12.2.4. Tell you who it has been, or will be, shared with.

12.2.5. Let you know whether any automated decision-making is being applied to the data, and any consequences of this.

12.2.6. Give you a copy of the information in an accessible format.

13. Who should you contact if you have any questions or concerns?

13.1. If you have any questions or concerns regarding processing of personal data as referred to in this privacy notice including your data subject rights, please contact us at hello@martingale.foundation.

13.2. If you feel that your questions or concerns have not been dealt with adequately on any data protection matter, please get in touch with us and the matter will be escalated to our Director of Governance. If you remain unhappy with our response or if you need any advice, you can contact the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, tel: 030 123 113 (local rate) or 01625 545 745 if you prefer to use a national rate number. Please visit their website (www.ico.org.uk/concerns) for information on how to make a data protection complaint.

14. What if we change our products and services or this policy?

14.1. As our products and services change and also as national and international policy and law change, we may need to update this policy, which will be available on our website. Please check this policy regularly to ensure you understand how we use your information.

14.2. It is a condition of using the sites and our services that you agree to this policy and how we use your data for legitimate purposes as described in more detail above.

15. Automated Decision Making

15.1. We use Beacon's automated scoring as part of your application process. This will provide scores based on certain answers provided in your application (e.g., student finance information, free school meals, parental occupation and caring responsibilities). We do this to understand the socioeconomic background of the applicant and to prioritise candidates who meet our criteria.

15.2. We automatically score a limited range of data to optimise the shortlisting process. Where a candidate provides additional information, or information that cannot be scored through the existing automated system, information is manually reviewed by Martingale. The automated scores are used to assist Martingale to make a final decision on understanding a candidate's alignment to Martingale's socioeconomic criteria and coupled with their academic score, are used to shortlist candidates for interview.

15.3. You can object to our use of Beacon's automated scoring by contacting hello@martingale.foundation.