

## Privacy Notes for the Martingale Foundation applications

### Who processes information?

The Martingale Foundation (Martingale) 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.

For full details on Purposeful Venture's data protection policy, please see [here](#). Purposeful Ventures is the entity responsible for, and in control of, Martingale data. If you have any questions about this policy, please send an email to [info@purposefulventures.org](mailto:info@purposefulventures.org) or [mary.henes@martingale.foundation](mailto:mary.henes@martingale.foundation). Please use the subject line 'Martingale: Privacy Notice'.

Martingale uses Beacon CRM, an online software product provided by Beacon Apps Ltd, to assist with our recruitment process. We use Beacon to process personal information as a data processor on our behalf.

We may change this policy from time to time, so please check our website for the most up-to-date version.

All personal data is held in compliance with UK Data Protection legislation, the UK General Data Protection Regulation and with all other laws concerning the protection of personal information, including the Privacy & Electronic Communications Regulations 2003.

The personal data we process may be shared with third parties, where it is necessary for us to do so, and we have a lawful basis to do so.

### In summary

- User privacy and data protection are human rights
- We care about you and your data and have a duty to ensure both are safe
- We will only collect and process your data when necessary to provide our services and support, as part of our legitimate interests as an organisation
- We will never sell or rent your personal information

'The project', 'Martingale', and 'scholarship programme' may refer to any and all activities carried out by the Martingale Foundation.

### What legislation is relevant

We ensure that our systems and website comply with the following data protection legislation:

- [UK Data Protection Act 2018 \(DPA\)](#)
- UK General Data Protection Regulation (UK GDPR)

Our compliance with the above legislation means that it is likely that we are compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you have any questions about this, please contact us at [info@purposefulventures.org](mailto:info@purposefulventures.org) or [mary.henes@martingale.foundation](mailto:mary.henes@martingale.foundation).

### How do we collect information about you?

We obtain information about you when you provide that to us directly about yourself, when you apply to us for a Martingale scholarship, when you contact us directly about your application or scholarship, or otherwise,

or (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).

We might also obtain information about you automatically through our direct engagement with you, for example when you attend an event.

Finally, we may receive or collect information about you from third parties, in particular the university or universities to which you have applied or enrolled on a course, and our funders. When personal information 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 information may be shared with us and combined with 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 data is going to be used.

## What type of information is collected?

The personal information we collect from you might include:

- your name
- contact details (including address, email address and telephone number)
- date of birth
- gender
- past and present academic attainment history
- past and present employment history
- application information relating to your application to a partner university including funding information
- details of education and personal background and status, such as whether your parents attended university, what type of school you attended, whether you received free school meals or similar non-protected measures
- financial information
- family details and next of kin contact information
- other personal information relating to your personal and/or family circumstances
- photos of you
- answers to application questions and surveys such as details about career aspirations and/or opportunities
- equal opportunities information (including details about your race or ethnicity, religious beliefs and sexual orientation)

Some of the personal information that we may collect is known as special category information. This means that the information is more sensitive than other types of information 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.

Data we hold will be used confidentially, and to help us to deliver our projects or to fulfil legal or regulatory requirements if necessary.

Where we need to collect personal information by law, or in order to contract with the University to provide a scholarship to you, 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.

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.

### How do we use the personal information of third parties?

When applying for a scholarship or (if successful) during the receipt of your scholarship, you may provide us with personal information relating to third parties (e.g. family members, next of kin, etc.)

We will use the personal information of those parties in accordance with this Notice and to the extent necessary to protect your legitimate interests and/or vital interests.

We may also, in order to ensure you receive the most appropriate support, receive information about other persons from third parties (e.g. the university with which you have enrolled, or universities to which you have applied). We will use that information in accordance with this Notice and to the extent necessary to protect your legitimate interests and/ or vital interests, and to the extent necessary for our legitimate interest in providing the best possible support to you.

### How do we use your information?

We process your personal data to enable us to run our scholarship programme. 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 information as noted above). For each of the purposes we have set out the legal bases upon which we use and share your personal information in the table below).

Purpose for processing your personal data	Legal basis
Process and consider your funding and scholarship application	This is in our legitimate interests in order to enable us to operate the scholarship programme you have applied to.
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.
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.  This is also necessary for the performance of our contract with the partner universities.
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.  This is also necessary for the performance of our contract with the partner universities.
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.  This is also necessary for the performance of our contract with the partner universities and funders.
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.  This is also necessary for the performance of our contract with our funders.

Purpose for processing your personal data	Legal basis
Seek your views and comments on our services	This is in our legitimate interests in order to improve the scholarship programme.
Notify you of changes to our services	This is in our legitimate interests in order to provide our services.
Send you communications that you have requested	This is in both our legitimate interests in order to ensure that we provide you with appropriate information you require.
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 information, we may process that information for reasons of substantial public interest.
Register you for an event we are running and communicate with you about it	This is in our legitimate interests in order to provide our services.
Monitor our service 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.  Where we need to process special category information to monitor our delivery we may process that information for reasons of substantial public interest.
Ensure we monitor our activities and provision of our services 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 where necessary in the public interest. In certain circumstances we may, as an alternative, seek your consent.
To manage a dispute, appeal, or complaint	This is in our legitimate interests in order to provide our services and to benefit you and others who come to us for confidential support and advice.  Where the information is special category information, we may process that information for reasons of substantial public interest. In certain circumstances we may, as an alternative, seek your explicit consent.
To comply with any legal or regulatory obligations and in doing so, will need to disclose your personal information 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 information, we may process that information where necessary in relation to legal claims and/or for reasons of substantial public interest.

Purpose for processing your personal data	Legal basis
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 information 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.

Where we process special categories of personal information, we need further justification for doing so. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations
- Where it is needed in the public interest, such as for equal monitoring opportunities monitoring
- Where it is necessary to protect you or another person from harm.

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any contracts we enter into with you. The PV data retention schedule is available on request.

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.

### Who may we disclose your personal information to?

We may disclose your personal information to third parties as follows:

- 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.
- 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.
- With a third party to externally evaluate our programme in the furtherance of the programme and organisation.
- With our funders, to report applications and applicant enquiries, on the progress and outcomes of the project they have funded.
- With our governance members, to discuss, report on and assess the progress and outcomes of the project.
- In the event that we transfer the business of Martingale to another entity, we will disclose your personal information to the prospective other party.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply the agreements concerning you.

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

### Storing data

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.

We have a policy which explains how long we keep information. It is called a Data Retention Schedule and you can ask for a copy by emailing [info@purposefulventures.org](mailto:info@purposefulventures.org).

## Transfer outside of the European Economic Area (EEA)

We do not normally transfer your information to a different country outside the UK. However, some of our external third-party support partners are based outside the UK so their processing of personal data will involve a transfer of data outside the UK. Whenever we transfer personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented, including:

- We will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe and Standard Contractual Clauses.

## How can you access and update your information?

You can request a copy of the information we have about you at any time and we will provide you with a full copy within one calendar month free of charge. If you change any of your contact details, and would like these to be updated on our system, please email [mary.henes@martingale.foundation](mailto:mary.henes@martingale.foundation).

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.

## What will we do if there is a data breach?

If there is a data breach, our Data Protection Officer will investigate and where it is deemed to be likely there is a risk to the rights or freedoms of data subjects, you will be contacted, in addition to contacting the Information Commissioner's Office.

## What are your rights with regards to your data that we hold?

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

- Ask us for a copy of the information we have about you. This is called a 'subject access request'.
- Ask us to correct any information we have about you if you think it is wrong.
- Ask us to erase information about you (although we may have good reasons why we cannot do this).
- Ask us to limit what we are doing with your information.
- Object to what we are doing with your information.
- Ask us to transfer your information to another organisation in a format that makes it easy for them to use. If you make a subject access request, and if we do hold information about you, we will:
  - Give you a description of it.
  - Tell you why we are holding and processing it, and how long we will keep it for.
  - Explain where we got it from, if not from you.
  - Tell you who it has been, or will be, shared with.
  - Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
  - Give you a copy of the information in an accessible format.

More information about your rights is available in our data protection policy. To request a copy, email us at [info@purposefulventures.org](mailto:info@purposefulventures.org).

### Who should you contact if you have any questions or concerns?

Martingale and Purposeful Ventures aim to comply fully with their obligations under the GDPR. If you have any questions or concerns regarding Purposeful Ventures management of personal data including your data subject rights, please contact us at [info@purposefulventures.org](mailto:info@purposefulventures.org).

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](http://www.ico.org.uk/concerns)) for information on how to make a data protection complaint.

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

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.

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.

### Consent

In order for us to process your application, we need consent from you. In your application you have provided information about yourself, your background and education. The data collected will be processed by the Martingale Foundation (PV), Beacon CRM, and, if successful, the university you progress to, in accordance with the Data Protection Act (DPA) 2018 and GDPR and held in accordance with our Privacy Policy. The selection process will prioritise applicants based on their responses to part D, which may require considering specific protected characteristics if voluntarily shared by applicants. Data collected in the personal information section will be used for monitoring purposes only and will not be considered when determining application outcomes. This process adheres to the Equality Act 2010. Your data may be shared with appropriate third-party organisations for research, monitoring and evaluation purposes.

Your data may be used for the 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.

The outcome of all applications to the Martingale Foundation will be determined at the sole discretion of the Martingale Foundation. Any decision will be final and there will be no automatic right to appeal.