

# Privacy Notice

## General

The Martingale Foundation (Martingale) is part of Purposeful Ventures which is a registered charity (number 1204622) whose registered office is at 1 EdCity, EdCity Walk, W12 7TF.

Purposeful Ventures is the data controller under UK data protection law meaning it is the entity responsible for, and in control of, Martingale data. For full details on Purposeful Venture's data protection policy, please see [here](#). 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'.

This privacy notice (the "**Notice**") should be read in conjunction with the [Purposeful Ventures general privacy notice](#) which can be found on their website.

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

## **Research projects – investigating topics concerning Martingale's activities in connection with post-graduate education, such as which types of PhD programmes provide the best support and completion rates for students from low-socioeconomic backgrounds**

Through these research projects, we want to learn more about the experiences of postgraduate students and also people who supervise or oversee postgraduate students.

We are looking for participants to take part in research projects which will typically involve **one-to-one interviews, focus groups and online surveys** who are either current or former postgraduate students or have a role in overseeing or supervising these types of students. For certain research projects, we require students who meet specific criteria such as:

- Current PhD students who have completed **at least two years** of PhD study AND from a low-socioeconomic background who have UK 'Home Fee' status for their PhD programme
- Former PhD students (either completed PhD or left PhD study) from a low-socioeconomic background who had UK 'Home Fee' status during their PhD programme

The Martingale Postgraduate Foundation (Martingale) is committed to protecting and preserving the privacy of research participants.

Participation in the interviews and focus groups is entirely optional.

Martingale will store all personal data collected in connection with the research projects securely in Purposeful Ventures' SharePoint which can only be accessed by Martingale staff members, relevant Purposeful Ventures staff, and Martingale's designated IT support service.

## **What personal data do we collect and use?**

If you express an interest in participating in a research project:

- Personal details such as your name and contact details including your email address;
- Where applicable to a particular research project, confirmatory information, such as your declaration that you hail from a lower-socioeconomic background (we have set out the criteria that we would expect that someone from a low-socioeconomic background would meet in the Information for Participants document, but this will not be formally verified) for participants who are currently or were a former recent postgraduate student;
- Information relating to your postgraduate programme such as your length of study, place of study and specific details of your postgraduate programme for participants who are currently or were a former recent postgraduate student;
- information captured during any correspondence with you such as telephone calls and written or email correspondence;
- records of which project you have expressed interest in; and
- information about your preferences to receive information from us about future research projects where there is an opportunity to participate.

If you participate in a research project

- Any personal data disclosed in connection with the research project such as your responses to our questions set out in a research project survey or any personal data that is disclosed and transcribed from your participation in an interview and/or focus group pursuant to the research project;
- Records relating to your consent to our processing of your personal data in connection with a research project; and
- Records of the research project you participated in and how (if applicable).

## **Special Category Data**

In processing your personal data in connection with certain research projects, we may, in certain circumstances, collect special category data relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, sexual orientation and health. This may be disclosed in either:

- your free form responses to our survey; or
- disclosed in your responses provided during the interview and/or focus group session.

We will rely on your explicit consent for processing such special category data for the aforementioned purposes. We will implement all appropriate measures to process special category data in accordance with Data Protection Laws.

## For what purpose do we use your personal data

We only process personal data for the purposes described in this Notice. Data Protection Laws require companies to have a "lawful basis" to collect and use personal data. For this research project, this will be that you have given clear consent for us to process your personal data for the purposes of this research project;

We will process your personal data for the following purposes and in reliance of the listed lawful bases:

<b>Purpose for processing your personal data</b>	<b>Lawful basis</b>
<p>For the purposes of preparing research reports and sharing such reports externally on the Martingale website or in academic journals. This processing would include:</p> <ul style="list-style-type: none"> <li>collecting your responses to our surveys and in any interviews and focus groups; and</li> <li>anonymising your shared responses.</li> </ul>	<ul style="list-style-type: none"> <li>We have your consent.</li> </ul>
<p>For the purposes of recording that we have your consent to process your personal data in connection with your participation in a research project.</p>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation; and</li> <li>Legitimate Interests (administration of research project)</li> </ul>
<p>For the purposes of general correspondence with you in connection with a research project e.g. any expressions of interest for participating in the project.</p>	<ul style="list-style-type: none"> <li>Legitimate interests (administration of research project)</li> </ul>
<p>To contact you about opportunities to participate in future research projects</p>	<ul style="list-style-type: none"> <li>We have your consent</li> </ul>

## Anonymisation

If you choose to participate in one of our research projects, we anonymise your responses prior to sharing such data externally in the form of reports. Specifically, we will anonymise any personal data that is:

- disclosed in your responses to our questions set out in any research project surveys; and
- disclosed and transcribed from your participation in any interviews and/or focus groups.

We will be relying on your explicit consent to anonymise your personal data in the manner set out below.

Anonymisation is a data processing technique that removes or modifies personally identifiable information. The intention is to produce data that cannot be associated with any one individual.

*Why are we anonymising your information?*

We will be including anonymous data collected during our research projects in reports that will be prepared, published and shared externally on our website or in academic journals. As the publication of

these reports will be permanent, and any data included in such reports will be accessible by the general public, we intend to anonymise the data in order to ensure compliance with our data protection obligations.

By sharing anonymised data, we will be able to share the findings of our research projects with likeminded third parties in a safe and privacy compliant manner that protects your individual data protection rights.

*How will we anonymise your personal data?*

We will anonymise your personal data by taking the following steps:

- De-identifying you from the personal data in question. This will include removing references to personal information such as name, age, ethnicity, or any other identifying features of the personal data. Where possible, elements of any anecdotes, stories or experiences provided by the participants will be changed, removed or amended (as appropriate) to reduce the risk of reidentification.
- Where possible, the anonymised data will be aggregated, filtered and/or categorised into subsets of data that will be included in the externally shared reports.

The data that we will share in the reports itself will be anonymised, unattributable and aggregated where possible. As a result, it is our view that there is very remote chance that any participant will be re-identified.

We will keep an identifiable set of this anonymised data for a period of 6 months after the publication of the initial Martingale-produced report in connection with the administration of the project, such as to enable us to address any queries and concerns in connection with responses provided by a participant. This identifiable set of data will be deleted at the end of this 6 month period, and we will no longer have the capability to reidentify the anonymous data of each participant.

We will hold the following data for a 5-year period:

- your name,
- email address,
- which project you have expressed interest in
- which project you participated in and how (if applicable)
- your consent form (if applicable)

After which, this data will be deleted. Where you have provided your consent, we may contact you to invite you to participate in future research projects run by Martingale during this 5-year period.

### **Who we share your personal data with**

When we share your personal data, we do so in accordance with Data Protection Laws.

We may share your personal data with third party IT Service Providers, such as our provider "Penelope".

Any such sharing of personal data shall be subject to an appropriate data sharing agreement with the relevant third party, fully in compliance with Data Protection Laws.

For more information on instances whereby your personal data will be shared, please refer to paragraph 2 of the Purposeful Ventures general privacy notice.

### **Personal data: international transfers**

We may share your personal data with external organizations, such as Purposeful Venture's secure cloud-based data storage system, for storage purposes. In this case, personal data that we hold may be transferred to, and stored at, a country outside of your country of residence. This could include countries outside of the EEA, such as the U.S. and Brazil.

To the extent we transfer personal data outside of the UK and EEA, we will ensure such transfers comply with the Data Protection Laws. This may include entering into data transfer agreements with recipients. For more information, please refer to paragraph 7 of the Purposeful Ventures privacy policy.

### **How long do we keep your data for?**

We will only keep your personal data for as long as is necessary to fulfil the relevant purposes as set out in this Notice and research project, and more widely to comply with our legal obligations. With respect to our retention of identifiable data in connection with our anonymization process, please see the section above on anonymisation.

### **What are your rights?**

If we hold your personal data, you may be entitled to make certain requests of us in relation to the personal data that we hold about you. If you wish to make any such request, you should submit it by email to [info@purposefulventures.org](mailto:info@purposefulventures.org) or [mary.henes@martingale.foundation](mailto:mary.henes@martingale.foundation).

Please note that not all of your data subject rights will be absolute; this means that there may be some circumstances where we may not be able to comply with your request (such as where this would conflict with our obligation to comply with legal requirements). However, if we cannot comply with your request, we will tell you the reason, and we will always respond to any request you make.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restrict processing and the right to withdraw consent) will mean we can no longer accommodate your participation in the research project. We will inform you of these consequences when you exercise your right.

Your rights under applicable Data Protection Laws are set out in paragraph 6 of the Purposeful Ventures Privacy Notice. In addition to your rights set out therein, you have the following rights in respect of your participation in the research project:

- **the right to rectification:** we take reasonable steps to ensure that your personal data that we hold is accurate and complete, however, you can ask us to amend or update the personal data if you do not believe that this is so or if your details change;

- **the right to withdraw consent:** we may ask for your consent for certain uses of your personal data – we have indicated in this privacy policy where we need your consent. You have the right to withdraw your consent (in whole or in part) at any time.

Please note that any rights you may have in respect of your personal data will not be available in respect of data that has been anonymised in accordance with this Notice, and shared externally through the published report. As the data published in the report is deemed anonymous, Data Protection Laws are no longer applicable in respect of such data.

### **Updates to this Notice**

This Notice may be updated periodically to reflect any necessary changes in our privacy practices or any changes needed for compliance with Data Protection Laws or other laws. In such cases, we will indicate at the top of the Notice when it was most recently updated.