

The Medical College of Saint Bartholomew's Hospital Trust Privacy Notice

About this document

This privacy notice explains how The Medical College of Saint Bartholomew's Hospital Trust (the "Trust", "we", "our", "us") collects, uses and share personal data, and your rights in relation to the personal data we hold.

This privacy notice concerns our processing of personal data of our website users and grantees, including those currently applying for, in receipt of, or who have previously received our awards ("Award Holders") and those who are currently supervising, or who have previously supervised, Award Holders ("Supervisors") (together, "you", "your").

We may modify this privacy notice at any time. Please check the Trust's website here: <http://www.barts-londonschooltrust.org.uk/privacy/> to see the latest version of the privacy notice.

Data controller

The Medical College of Saint Bartholomew's Hospital Trust, a registered charity under registered charity number 1115519 and a company registered in England with company number 05861679, is a 'data controller' subject to the UK General Data Protection Regulation (the "UK GDPR"), the Data Protection Act 2018 ("DPA"), and any successor legislation or regulations governing data protection and privacy in the UK. The Trust is registered with the UK Information Commissioner's Office with registration number ZA477961.

How we collect your information

We need to collect some personal information to allow us to provide grants to you (or others) and to comply with our legal and fiduciary duties. We will only collect the minimum amount of information necessary to provide a service to you, or to comply with our legal responsibilities.

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before making an application for one of our grants;
- when you submit a formal application for a grant to us or the Faculty of Medicine and Dentistry, Queen Mary University of London ("FMD") and in drawing up the grant agreement;
- from the information you provide us regarding a donation or legacy or through the due diligence we may conduct if you make a donation or legacy to us;
- from third parties, for example your previous or current institutions of study, or your previous or current employers, in order to verify details about you and/or your application for a grant;
- when you communicate with us by post, telephone or email, for example in order to make enquiries about an application or a grant; and
- in various other ways as you interact with us during your time as an Award Holder or Supervisor, for example by submitting annual and progress reports, for the various purposes set out below.

The types of information we collect

We may collect the following types of personal data about you (and anyone at your organisation who we need to carry out due diligence checks on), for example:

- contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es));
 - your communication preferences;
 - records of communications and interactions we have had with you;
- biographical and educational information, including:
 - your name, title, gender, nationality, right to live and work in the UK and date of birth;
 - details of your education history;
 - details of your professional activities and employment, including work contact details;
 - education and employment related references;
 - details of honours, awards, publications etc.;
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 - lifestyle information and social circumstances;
 - your interests and extra-curricular activities;
 - information concerning your engagement with us, including attendance at our events, responses to surveys or focus groups, records of meetings, etc.;
- financial information, including:
 - details of financial transactions, for example, grant payments;
 - your bank account number, name and sort code (used for processing grant payments, scholarships and donations / legacies);
 - details of any donations or bequests you choose to make, including the donation / legacy amount, purpose, date, method of payment, cheque numbers or other payment references;
 - Tax (residence) status;
- and any other information relevant to an application or grant.

Under the UK GDPR, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs and political opinions. We may collect such sensitive personal data, including information concerning your health and medical conditions (for example, disability and dietary needs), where this is necessary for the provision of a grant to you.

The basis for processing your information and how we use it

We may process your personal data because it is *necessary for the performance of a contract* with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you make an application for one of our grants (for example, to send answers to any questions you have about a grant);
- when you submit a formal application for a grant, in order to assess your eligibility for that grant;
- if you are successful in your application, to provide you with a grant in accordance with all relevant terms and conditions (and, in this respect, we may process your personal data in connection with any checks to ensure that you are complying with the conditions of your grant, where this is necessary for the performance of the award terms and conditions);
- to deal with any concerns or feedback you may have; and
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is *necessary for our or a third party's legitimate interests*. Our "legitimate interests" include our charitable objectives to promote all aspects of medical and dental education at the FMD and to provide opportunities for research in and the advancement of medical, dental and surgical knowledge at the FMD.

In this respect, we may use your personal data for the following:

- for administrative purposes, for example, in connection with payments made to you under a grant, donations / legacies made by you or an event you have registered for or attended;
- for internal record-keeping, including the management of any feedback or complaints;
- to monitor and evaluate the performance and effectiveness of our grants;
- to seek advice on our rights and obligations, such as where we require our own legal advice; and
- to publish stories, news and updates about the projects we are supporting on our website at <http://www.barts-londonschooltrust.org.uk/>.

We may also process your personal data for our *compliance with our legal obligations*. In this respect, we may use your personal data for the following:

- to meet our compliance, legal and regulatory obligations, such as compliance with anti-money laundering laws and tax reporting requirements;
- for the prevention and detection of crime;
- to deal and assist with legal claims, requests and investigations, including those made under data protection law, or requests for formal disclosure by competent authorities; and
- to administer and maintain such records as may be required by UK regulations and legislation from time to time.

We may also process your personal data where:

- it is necessary to protect your or another person's vital interests;
- it is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property, and/or the rights or property of our Award Holders or Supervisors); or
- we have your specific or, where necessary, explicit consent to do so.

Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to carry out all or some aspects of our grant-making activities and/or it may affect the delivery of those activities to you.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data to a variety of recipients including:

- our employees, agents, contractors or partners where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process data on our behalf as part of administering the grant application process, the grant itself (including market research with grant holders);
- internal and external auditors and our legal professional advisors;

- when the Trust is legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example, by the Charity Commission; and
- where you have given your consent for us to do so.

In relation to our Award Holders, when you apply to us for PhD funding and where you also, at the same time or at any time afterwards, apply to the Health Advances in Underrepresented Populations and Diseases PhD programme ('HARP') we will share your personal information with the Directors of HARP and with other organisations involved in HARP, namely Queen Mary University of London, City University of London, Barts Charity, Barts Health NHS Trust and East London Foundation Trust. This may involve sharing your completed application forms, including equality monitoring information, as well as your name and contact details, your CV, details of your skills, education and experience, your proposed areas of study, and other information supporting your application. Your personal data will be shared for the purposes of evaluating your application and, if your application is successful, to administer your participation in the HARP doctoral training programme.

In relation to our Award Holders, when you apply to us for PhD funding and where you also, at the same time or at any time afterwards, apply to the Healthcare Professional Clinical Research Training Programme funded by the Barts Charity, we will likely share your personal information with the Barts Charity. This may involve sharing your completed application forms, including equality monitoring information, as well as your name and contact details, your CV, details of your skills, education and experience, your proposed areas of study, and other information supporting your application. Your personal data will be shared for the purposes of assessing your application and making a decision on whether and to what extent we will fund your research.

We do not sell your personal data to other organisations.

International data transfers

As a matter of course, we do not transfer your personal data outside of the UK and/or the European Economic Area ("EEA"). We may, however, transfer your personal data around the world on an *ad hoc* basis, for example where this is necessary for interaction with you, and you are located outside of the EEA / UK. In such circumstances, we will consider whether any additional measures are required to give adequate protection for the information when it is transferred outside of the EEA / UK.

How long your information is kept

We retain your personal data only for so long as is necessary to deliver our services to you, and to protect our legal interests or as otherwise stated to you when your data is collected.

To determine the appropriate retention period for personal data, we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm from any unauthorised use or disclosure, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal requirements.

Your rights

Under the UK GDPR, you have the following rights in relation to our processing of your personal data:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data in certain circumstances;
- to require us to restrict our data processing activities in certain circumstances (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);

- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for transmitting that personal data to another data controller;
- to object, on grounds relating to your situation, to any of our processing activities where you feel this has a disproportionate impact on your rights;
- to complain about the processing of your data to the UK data protection regulator – the Information Commissioner’s Office (**ICO**) (www.ico.org.uk). The ICO does though recommend that you first try and resolve the complaint with us.

Please note that the above rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply. For example, if we have reason to believe the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this privacy notice.

Contact us

If you have any questions about this privacy notice or how we process your personal data, or if you would wish to exercise any of your legal rights in respect of your personal data, please contact our Secretary, James Maloney, using the following details:

- Email: james.maloney@farrer.co.uk
- Telephone: 020 3375 7114
- Post: 66 Lincoln’s Inn Fields, London, WC2A 3LH

8 March 2023