



Two Ridings Community Foundation PRIVACY POLICY

Purpose

This privacy policy (sometimes also described as Privacy Statement) sets out how Two Ridings Community Foundation (the Foundation) uses and protects any data given to us. We will also publish privacy notices which describe how we gather and use information in regard to specific service contexts – e.g. Open Data Policy. Two Ridings Community Foundation is the Data Controller.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services, then you can be assured that it will only be used in accordance with this privacy policy.

How do we collect information from you?

The Foundation collects information from you when you connect with us as a donor, fund holder, grant applicant, trustee, volunteer, apply for a vacancy, newsletter recipient, partner, attend a Foundation event or make a general enquiry.

We collect information in the public domain. Examples include information gathered from a news article or on-line media, including social media like LinkedIn or Threads. We may also use publicly available directories and similar information such as the Royal Mail's National Change of Address database and Companies' House.

Sometimes we receive personal information indirectly, for example if you donate online or purchase a ticket for an event organised by the Foundation. In these cases, your card information, date of birth, remains private and is not held by us. This information is collected by our third-party payment processors, Charities Aid Foundation (CAF), Ticket Tailor and Stripe or other third-party payment processors that we may use from time to time who specialise in the secure online capture and processing of credit/debit card transactions.

What type of information is collected?

The type of personal data we collect may include the following,

- Name(s) and address, email, phone number and other relevant contact details and communication preferences

- Your connections to other organisations (e.g. your employer)
- Occupation, interests and professional activity and network(s)
- Details of your donations
- Details of your grant applications, including any other information needed for the assessment of a grant which may include financial, family, education and employment information
- Records of your interactions with the Foundation for example: correspondence, meeting notes, attendance at events
- Photographs and videos

The Foundation uses photographs and videos for promotional and archival purposes. If you are attending a Foundation event at which there may be photography or filming take place this will be clearly indicated, and you can let us know and we will make best efforts not to capture or retain any images or footage of you. You may also let us know in advance of an event by contacting us.

What we do with the information we gather:

We will process your personal information for our legitimate business and charitable interests, which are to promote lasting charitable giving, by bringing together donors with their chosen causes, through well targeted grants that make a genuine difference to the lives of local people.

We will use the information you provide for some or all of the following,

- To provide you with the services or information you have requested
- To ensure we know how you wish to be contacted
- To assess your eligibility for a grant
- To administer your fund
- To administer your donation including processing Gift Aid
- To keep a record of your relationship with us
- To undertake statistical analysis
- To understand how we can improve our communication and services
- To invite you to Foundation hosted events that we think may be of interest to you
- To send communications about our news and events or other information which we think you may find interesting using the contact details which you have provided. You will always have the ability to decline further contact
- We may use some of the information you have provided for reports, or to contact you for research purposes - this will be anonymised unless you give your permission

We may share your information with another organisation owing to specific legislation. This will be made clear to you depending on the service you access.

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our supporters and grant applicants and to improve the services that we provide.

The information that we obtain from other organisations may depend upon your privacy settings or responses you give so you should check them regularly. This information will be obtained from places such as Charity Commission, Companies House and articles published in the national and local press.

We will never pass on your data to a third party without your permission. We will never sell any data.

Use of AI Tools

We follow our AI Policy that outlines our responsible use of Artificial Intelligence with data privacy and security being one of the guiding principles. We do not process personal or sensitive data outside of our approved AI systems or tools.

We currently use Microsoft Copilot, an artificial intelligence tool built into our secure UK-based Microsoft 365 system, to help our staff work more efficiently by summarising information, creating draft content and supporting meeting preparation. Copilot may use data already held in our systems, such as emails, documents and Teams transcripts to generate these outputs. Where we record or transcribe Teams meetings, these recordings and transcripts are kept for no longer than required. Copilot does not make decisions about individuals, and all outputs are checked by staff to ensure accuracy.

We continue to monitor how we use Copilot and other AI systems and tools, and any future changes will be reflected in this privacy notice.

Protecting your data

We are committed to ensuring that your information is secure. We keep your data secure within our database by implementing suitable security measures.

In principle we do not share your data with anyone else or any other organisation unless it is necessary for the purpose for which you have given us the data.

Examples are given below:

- We will provide information to HMRC on Gift Aided donations since we have a legal obligation to provide this information
- We will share information on grant applicants with volunteers working with the Foundation as grant assessors and grant panel members. Information may also be shared with donors

- We will also publish data on grant recipients for groups/organisations (amounts/name of group/purpose) but we anonymise details for any individual grantees
- We may share basic information on the attendees at an event or function or meeting with the host or other person who is a volunteer with the Foundation

All volunteers are provided with the Foundation's Volunteer Policy and Data Protection Policy as part of their induction and are asked to sign the Foundation's Confidentiality Agreement.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

If you are 13 or under, you should get your parent/guardian's permission before you provide any personal information to Two Ridings Community Foundation. We will contact your parent/guardian or support organisation representative to confirm that consent has been provided.

Retention

We will not retain your information for longer than is necessary. This will normally be for a maximum of six years after our relationship with you has ceased although we are occasionally required to hold data for longer periods for specific programmes.

Website links

We have cookies on our website and a designated cookie policy. The cookie policy is available at www.tworidingscf.org.uk

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

Our Responsibilities

The law requires us to tell you the basis on which we process your data.

- Some activities (for example sending you emails which promote the Foundation) require your consent. If the law requires your consent to process data in a certain way then we will obtain it before carrying out that activity

- Other activities are carried out to fulfil a contract or agreement. Examples include holding funds which are subject to a Fund Agreement or organising a ticketed event. Each requires us to know who you are and to process your information in order to undertake the task you have asked us to do. If a contract is in place then we will process your data based on that contract
- In all other cases the law allows us to process your data if it is in our legitimate interest to do so, but only so long as we need to and your “interests or your fundamental rights and freedoms are not overriding”. Practically speaking this means we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in this privacy notice

We will keep data for as long as is needed to complete the task for which it was collected. Relationships between donors, grantees and the Foundation are often long term, and so we expect to keep your data for as long as that relationship exists, or until we no longer need it.

Your Rights

The law requires us to tell you, that you have various rights about the way we process your data. These rights are as follows,

- **Access to your personal information:** you may request a copy of the personal data we hold about you.
- **Correct your personal data:** you can ask us to correct or delete personal information you think is inaccurate or incomplete.
 - If any of the personal data that we hold about you changes then we encourage you to please let us know as soon as possible so that we can ensure that our records are accurate and up to date.
- **Erasure of your personal data:** you can ask us to delete your personal information if the data is no longer being used for the purpose you have consented to or if you have withdrawn consent given to us for using that data.
- **Restrict the use of your personal data:** you can ask us to limit the use of your personal information in certain circumstances.
 - Whenever you are asked to fill in a form look for the boxes that you can click to indicate how you would like us to contact you.
 - Electronic communications will contain an ‘unsubscribe’ link.
- **Object to using your personal data:** you can ask us to stop using your personal data in certain circumstances.
- **Withdraw consent:** you can withdraw your consent at any time where we rely on your consent to process your personal data.

You are not required to pay any charge for exercising your rights. If you make a request we have one month to respond to you.

How to Complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the details noted at the end of this policy.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Changes to this Policy

This policy will be reviewed every two years and may be updated anytime in the event of updated procedures, guidance or legislation. Any changes we may make to our privacy policy in the future will be posted on www.tworidingscf.org.uk

Contacting Us

If you have any questions about this privacy notice, about the way in which we process your data, or if you wish to change the way we use your data, including how we communicate with you, please contact us:

Two Ridings Community Foundation, The Homestead, 40 Water End, York, YO30 6WP

Email: info@tworidingscf.org.uk

DOCUMENT CONTROL:	
Version:	2.1
Responsibility for review:	Finance and General Purposes Committee
Ratified by:	Finance and General Purposes Committee
Date ratified:	February 2026
Next review date:	February 2028