

JPC O'Rafferty Charitable Trust (SCIO)

Scottish Charity Number: SC052898

Data Protection Policy

The **JPC O'Rafferty Charitable Trust (SCIO)** ("we", "our", "us", or the "Charity") is committed to protecting the personal data that it processes. This Data Protection Policy outlines how we collect, store, use, protect, and process personal data in accordance with applicable data protection laws, including the **General Data Protection Regulation (GDPR)**.

1. Introduction

We are fully committed to complying with data protection laws and to safeguarding the personal data entrusted to us by individuals, applicants, and other stakeholders. This policy applies to all personal data we collect in the course of providing grants and other services related to the work of the Charity.

2. Purpose of Data Processing

We process personal data for the following purposes:

- **Processing Grant Applications:** To assess and process grant applications and determine eligibility for funding.
 - **Monitoring Grant Use:** To track and monitor the use of granted funds, ensuring they are used for their intended purposes.
 - **Communication:** To communicate with applicants and grant recipients about their projects, including requesting updates, progress reports, or feedback.
 - **Providing Feedback:** To collect feedback on completed projects for evaluation and reporting purposes.
 - **Compliance with Legal Obligations:** To comply with legal, regulatory, and financial reporting obligations, including record-keeping requirements for grant-making activities.
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3. Types of Personal Data We Collect

We may collect and process the following types of personal data:

- **Personal Identification Information:** Full name, contact details (address, email address, phone number), and date of birth for individual applicants and charity trustees.
- **Project Information:** Details of grant applications, including project descriptions, funding requests, budgets, and project progress.
- **Financial Information:** Financial statements, budget breakdowns, and details of other funding sources.
- **Documents:** Identification documents (e.g., passport, driver's license), supporting documents, invoices, and receipts.

- **Feedback Information:** Responses to feedback surveys or forms, including information about the outcomes of grant-funded projects.
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4. Legal Basis for Data Processing

We process personal data based on the following legal grounds:

- **Consent:** When you provide us with explicit consent to process your personal data (e.g., applying for a grant).
 - **Contractual Obligation:** The processing of personal data may be necessary to fulfill a contract, such as assessing and awarding grants.
 - **Legal Obligation:** We may process personal data when necessary to comply with legal obligations (e.g., record-keeping requirements).
 - **Legitimate Interests:** We process personal data to fulfill the legitimate interests of the Charity in carrying out its charitable purposes, including administering grants and monitoring their effectiveness.
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5. Data Retention

We will retain personal data for no longer than is necessary to fulfill the purposes for which it was collected, including compliance with legal, accounting, or reporting obligations.

The retention period will depend on the type of data, the purposes for processing, and applicable legal requirements. For example:

- **Grant-related data** (including project details, funding requests, and final reports) will be retained for a period of at least 6 years after the completion of the project or the end of the relevant financial year.
- **Feedback forms and evaluation data** will be retained for up to 3 years after submission.
- **Charity Trustee Personal Data** will be retained for 6 years after retirement of any Charity Trustee.

Once personal data is no longer required for these purposes, we will securely delete or anonymise the information.

6. Data Security

We are dedicated to safeguarding the security of your personal data. We implement appropriate physical, electronic, and administrative measures to protect personal data from unauthorised access, disclosure, alteration, or destruction.

However, please note that no method of transmission over the Internet or electronic storage is 100% secure. We cannot guarantee the absolute security of your data, but we will do our best to ensure its protection.

7. Sharing Personal Data

We will not share your personal data with third parties unless:

- **You have given consent** to share your data with specific third parties (e.g., auditors, regulatory authorities).
- We are required to do so by law or regulatory requirement (e.g., for legal or financial reporting).
- It is necessary for the administration of the grant (e.g., sharing data with external evaluators or partners involved in the project).

We will ensure that any third parties with whom we share personal data are compliant with data protection laws and have appropriate safeguards in place.

8. Your Rights Under Data Protection Laws

You have certain rights in relation to your personal data. These include the right to:

- **Access:** Request a copy of the personal data we hold about you.
- **Rectification:** Request the correction of inaccurate or incomplete personal data.
- **Erasure (Right to be Forgotten):** Request the deletion of personal data when it is no longer necessary for the purposes for which it was collected.
- **Restriction of Processing:** Request that we limit the processing of your personal data under certain conditions.
- **Objection:** Object to the processing of your personal data, including the use of it for direct marketing purposes.
- **Data Portability:** Request that we provide your personal data in a structured, commonly used format, or transfer it to another organization.
- **Withdraw Consent:** If you have provided consent for the processing of your personal data, you have the right to withdraw that consent at any time.

If you wish to exercise any of these rights, please contact us using the contact details provided below.

9. Third-Party Processors

We may use third-party service providers to assist with certain operations (e.g., data hosting, email services). These providers are required to protect your personal data in compliance with data protection laws and to process it only in accordance with our instructions.

10. International Transfers of Data

We do not transfer personal data outside the European Economic Area (EEA). However, if we were to engage in international data transfers in the future, we would ensure that appropriate safeguards are in place to protect your personal data.

11. Changes to This Data Protection Policy

We may update this Data Protection Policy from time to time in order to reflect changes in legal requirements or our data processing practices. Any changes will be posted on our website or communicated to you directly. The date of the last update will be indicated at the top of this page.

12. Contact Us

If you have any questions or concerns about this Data Protection Policy or the processing of your personal data, or if you wish to exercise your rights, please contact us at:

JPC O'Rafferty Charitable Trust (SCIO)

Email Address: jpcorafferty@sarahbrowncharitylaw.com

Postal Address: 17 Torwoodlee, Perth PH1 1SY

We will respond to your enquiry within the timeframes set by data protection laws.
