

PRUDENCE 'TRUST'

POLICY PRIVACY

CRN 1187700

[Adopted November 2025]

1. INTRODUCTION

1.1 In this Privacy Policy:

- 1.1.1 references to we, us or our means Prudence Trust Company Limited in its capacity as sole corporate trustee of The Prudence Trust, a registered charity in England and Wales (number 1187700), whose registered office is 32 Sackville Street, London, W1S 3EA;
- 1.1.2 references to you or your means the person accessing and using the Website or Services (as defined below);
- 1.1.3 references to the Website means the Prudence Trust website found at www.theprudencetrust.org;
- 1.1.4 references to Services means the making and administration of charitable grants, particularly but not exclusively in the following areas: mental health, disadvantaged communities, the arts and the environment; and
- 1.1.5 references to Applicants means the organisations that apply for charitable grants.

2. PRIVACY POLICY

- 2.1 This Privacy Policy sets out the basis on which we collect and use personal information about you through your use of the Website and our provision of the Services.
- 2.2 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we may disclose it to and your rights and choices in relation to your personal information.
- 2.3 In this Privacy Policy, the term “**personal information**” (also referred to as “**personal**

data”) means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to that individual’s physical, physiological, genetic, mental, economic, cultural or social identity. This includes information such as your contact details, account information, payment details, communications with us, and information about how you use our Website or Services.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

- 3.1 We are the data controller for the purpose of data protection law, in respect of your personal information collected and used through your use of the Website and our provision of the Services. This is because we dictate the purpose for which your personal information is used and how it is used.

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

- 4.1 We collect and use personal information about you in the course of providing the Website and the Services. The personal information we collect includes:

4.1.1 Information that you provide to us:

The information that you provide to us may include the following:

- (a) General contact information: name, email, address, telephone number;
- (b) Financial information: bank sort code and account number and

account details, income and expenditure report;

- (c) Dietary requirements and details of any access requirements you may have when you attend one of our events;
- (d) Personal information included within any case studies that are shared with us by Applicant organisations; and
- (e) Personal information provided in applications made by individuals for fellowship funding. This may include details of the individual's name, contact details, university that they are attending/wish to attend to complete their fellowship and details of the additional support the individual requires.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) when an Applicant applies for a grant;
- (c) when you apply for fellowship funding;
- (d) when you fill in forms for us;
- (e) when an Applicant sends in documents required to support an application for a grant;
- (f) when you report a problem with our Services; and
- (g) when you attend one of our events.

4.1.2 Information we collect from you:

If users of our website accept the GDPR Cookies Policy when they enter our site, Google Analytics collects website and app user behaviour to track metrics.

Information collected: Traffic sources (how users find the website), user behaviour (page views, time spent on pages, order that users navigate the site), session data (number of users, session statistics and overall engagement with the website) and technical information (the user's device, browser and operating system).

It can also gather demographic data such including age, gender, location and interests. Google Analytics prohibits users from sending Personally Identifiable Information (PII) such as an email address or name and so this information is collected anonymously. Our cookies policy can be found in the link below:

[Cookies Policy - Prudence Trust.](#)

5. INFORMATION ABOUT THIRD PARTIES

- 5.1 In the course of using the Services you may provide us with personal information relating to third parties.
- 5.2 For example, as part of a grant application Applicants may provide us with a case study containing personal information (which may include special category data) in respect of individuals with a mental health condition or disability who access the services of the relevant Applicant organisation.
- 5.3 We will use this personal information in accordance with this Privacy Policy. If a company provides personal information to us relating to a third party, for example, any personal information relating to a third party that is included within case studies that are shared with us or otherwise provided to us by Applicants in connection with a grant application, we ask the Applicant organisation to confirm that it has the consent of the third party to share such personal information with us and that it has made the information in this Privacy Policy available to the third party.

6. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

- 6.1 We use your personal information in connection with the Services and the Website. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties, including those referred to in paragraph 7 of this Privacy Policy below, for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information

Purpose	Legal Basis
To communicate with you and other individuals	<ul style="list-style-type: none">• Performance of contract (i.e. our obligations in connection with grant arrangements).

Purpose	Legal Basis
in connection with the Services.	<ul style="list-style-type: none"> Compliance with legal obligations (i.e. our obligations as a registered charity to safeguard the end use of our funds). Where you have provided your consent to us processing your personal information. Our legitimate interests in providing and improving our Services.
To manage any complaints, feedback and queries you may have in relation to our Services.	<ul style="list-style-type: none"> Our legitimate interests to manage and respond to any such correspondence
To review grant applications, including any personal information contained in case studies shared with us.	<ul style="list-style-type: none"> Where you have provided your consent to us processing your personal information.
To review any fellowship funding applications in our role as an observer on the selection panel.	<ul style="list-style-type: none"> Where you have provided your consent to us processing your personal information.
To retain information about your access and dietary requirements when you attend events with us.	<ul style="list-style-type: none"> Our legitimate interests in providing our events. Where you have provided your consent to us processing your personal information. For the establishment, exercise or defence of legal claims.
To share your name, job role and organisation details with other event attendees when you attend an event with us.	<ul style="list-style-type: none"> Our legitimate interests in providing our events.
To comply with any legal or regulatory obligations (including in	<ul style="list-style-type: none"> Compliance with legal obligations to which we are subject. Where it is in our legitimate interests to process your personal information as part

Purpose	Legal Basis
connection with a court order).	of ensuring our own compliance.

6.2 We may be required to obtain your personal information to comply with our legal requirements. If you do not provide the relevant personal information to us, we may not be able to process your grant application.

6.3 Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

6.3.1 enabling us to provide our Services;

6.3.2 compliance with applicable legal and regulatory obligations and any codes of conduct; or

6.3.3 protection of the Trust, the Trustee, employees and third parties.

7. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

7.1 We may share your personal information with:

7.1.1 Macdoch UK Limited, who provide certain services to us;

7.1.2 service providers, suppliers and sub-contractors who provide services to us (for example, our IT providers, payroll providers, banks, security service providers and insurance providers);

7.1.3 our professional advisors (including accountants, lawyers and auditors) that assist us in carrying out our activities;

7.1.4 organisers of our events and other individuals who attend our events; and

7.1.5 government authorities and third parties involved in court action, including external agencies and organisations (including the police, the relevant local authority and other law enforcement agencies/bodies) for the purpose of complying with applicable legal and regulatory obligations.

7.2. We may also disclose your personal information to other third parties, for example if there is a change of trustees to the Prudence Trust then we may share your personal information with the replacement trustee(s) or if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

8. DATA SECURITY

8.1 We use physical, electronic, and procedural safeguards to protect your information against loss or unauthorised access, use, modification, or deletion. However, no security program is 100% secure, and so we cannot guarantee the absolute security of your personal information.

8.2 The personal information that we collect from you will be stored in and processed in the UK only. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with data protection law, including the UK General Data Protection Regulation and the Data Protection Act 2018.

9. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

We are based in the United Kingdom. We will not transfer your personal information outside the United Kingdom.

10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

10.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

10.3 If you are a recipient of a grant, we will keep your personal information for the duration of the processing of your grant application and a period of six years after our funding ends.

10.4 If you submit an application for a grant but we do not approve your application, we will keep your personal information for a period of two years after your application was submitted.

11. YOUR RIGHTS

11.1 You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights by contacting us by email at Hello@theprudencetrust.org.

11.2 Further information on your rights in respect to your personal information can be found here: [For the public | ICO](#).

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.

	Summary of your rights
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate (only for such period as will enable us to verify the accuracy of your personal information); (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.

	Summary of your rights
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is, in the case of The Prudence Trust, the Information Commissioner's Office (ICO), where you think we have not used your personal information in accordance with data protection law. The contact details for the ICO are: https://ico.org.uk/ or 0303 123 1113

12. CHANGES TO OUR PRIVACY POLICY

We will keep this Privacy Policy under regular review. Any changes we make to this Privacy Policy in the future will be posted on this page. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

13. QUERIES/CONTACT US

If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by email at Hello@theprudencetrust.org or by post to 32 Sackville Street, London, W1S 3EA.