

Kennedy Memorial Trust

3 Birdcage Walk, London SW1H 9JJ

Tel: 020 7222 1151

www.kennedytrust.org.uk

Registered Charity No. 234715

Privacy Notice

Last updated: 23 November 2023

About this privacy notice

This Privacy Notice provides you with details of how we, Kennedy Memorial Trust - Charity No 234715 (the Trust), collect, process and store your personal data.

The Trust is committed to maintaining your confidence and trust with respect to your personal data. We will be transparent about the data we collect, hold and use and the choices you can make and your legal rights.

One of the main reasons the Kennedy Memorial Trust exists is to provide Kennedy Scholarships to British citizens to study at Harvard University or the Massachusetts Institute of Technology (MIT). This will involve the Trust sharing some of your personal data with these institutions in the United States, as well as members of the Trust community who are based in the United States, such as Trustees, utilising the EU-US Privacy Shield. We cannot provide our services without this data sharing.

We want to provide you with the best possible experience in your interactions with the Trust, whether as an applicant, student, alumnus/alumna, donor or supporter. We also want to ensure that our approaches to your support of our alumni relations or fundraising goals are respectful, professional and relevant.

The Kennedy Memorial Trust reserves the right to modify this Privacy Notice at any time. If the Trust makes changes to this Privacy Notice, the updated Privacy Notice will be published in a timely manner or any changes made will be communicated to the individuals whose personal data are affected.

Types of personal information we hold

The Trust is a data controller for the purposes of data protection. It processes data about the following data subjects:

Group A:

- Applicants for our scholarship programme

Group B:

- Current students that are being funded by our programme

Group C:

- Alumni of our programme
- Donors and potential supporters

Group D:

- Staff (including job applicants), trustees, volunteers, and contract staff
- Suppliers, contractors and service providers

i) All Groups

The information we collect about you may be obtained in three ways: directly from you during the Trust's relationship with you, from publicly available sources and/or from third parties providing us with services or acting on our behalf.

The personal data we process may be factual or include opinions (such as in email exchanges we may have with you); may include images, video or other recorded information; and may be held in a variety of forms, including digital, paper, and film.

We may hold and process the following types of personal data about you:

- Titles and names and other necessary identifying details, such as date of birth
- Contact details, including email addresses
- Log in details used to access systems provided by us
- Information related to applications, including references, academic and co-curricular activities, interests and achievements
- Education and employment information including references and referees
- For staff, performance reviews and disciplinary records
- Interests, activities and achievements
- Correspondence between staff and any of the other types of data subjects listed above.
- Social media, including posts, images, video and other Internet content/publications
- Records of personal interactions with us
- Your communication preferences and records of communications you have received from us
- Data obtained from cookies and similar technologies to help us understand how you interact with our email communications, websites and other online services we provide.

ii) In addition: Group A:

We process Special Category data about individuals:

- Ethnicity for statistical purposes with consent. This data is only used in an aggregate format and not in association with other identifiable data.

iii) In addition: Group B

We process Special Category data about individuals:

- Health information, including medical conditions, that you tell us about in order to provide guidance on navigating US health care and support services (for new Kennedy Scholars).

iv) In addition: Group C

The amount of data we collect and hold about you depends on the frequency and nature of your interactions and engagement with us, and may be gathered across your lifetime.

- Your attendance at events or visits which we organise.
- Your connection to other alumni, applicants, staff and other individuals associated with the Trust.
- Offers of and volunteering undertaken for the Trust.
- Current and past donations and pledges to the Trust, including any preference as to the purpose of and financial information related to processing these donations.
- Information which helps the Trust manage its fundraising approaches to you, such as understanding your ability to support the trust financially and your philanthropic priorities based on your previous giving, what you have told us, and sometimes publicly available information.

In very specific cases, we process Special Category data about individuals:

- Health information, including medical conditions, that you tell us about in order to provide a service to you (for example to provide accessibility provisions or alternative menus to meet your dietary requirements).

How we use your data

i) Group A:

The data supplied by applicants in any given year may be viewed throughout that year's competition by the trustees of the Kennedy Memorial Trust, as listed on the website www.kennedytrust.org.uk, as well as being viewed and analysed by other members of staff and any non-Trustees who serve on the selection committee or in the review process.

Individual applicant data will be used:

- to ensure your compliance with the eligibility requirements of that year's Scholarship competition;
- to corroborate your personal statement regarding your strengths as an applicant to the Scholarship and also to your preferred programme(s) at Harvard and MIT
- to enable the Trust to keep you updated regarding your progress.

ii) Groups B and C:

Data relating to those awarded a Kennedy Scholarship will be kept in full by the Trust as the basis of its alumni records and detailed historical archive and to enable it to keep in touch with individual Kennedy Scholars for the purpose of supporting our alumni and supporter relations and fundraising programmes. In the majority of these uses, we rely on legitimate interest:

- To manage our ongoing relationship with you and keep a record of your interactions and contributions.
- To keep you up to date with news about, as well as offers and opportunities from the Trust via our newsletters.
- To offer and manage a varied programme of events, tailored to your interests where possible.
- To help you maintain contact with your friends and fellow scholars across the years.
- To help you make connections to other scholars who may be able to provide guidance and advice to help you in your career.
- To publish your name in online directories, donor listings, guest lists with your permission.
- To take surveys and conduct market research.
- To help ensure our fundraising efforts are conducted efficiently and our approaches to you are respectful, professional and in line with fundraising best practice.
- To help us identify individuals who we believe may have interest and financial capacity to make a major contribution to the Trust.
- To help us manage our legal responsibilities in relation to donors and potential donors when accepting donations.
- To maintain a historical record of the Kennedy Scholarship programme.

Where this activity is being undertaken for a new contact with whom we have no previous relationship, we will provide the individual with a link to this privacy notice as part of our initial engagement.

When and how we share your data

We do not sell your data. We may need to share your data with third parties working on our behalf to help deliver the services we offer you. We will only do so by secure means and with a data sharing agreement in place. We only permit third parties to process your personal data for specified purposes with clear instructions provided. When your data is shared, we will always seek to only share the information needed to fulfil the purpose.

Third parties include:

- Harvard and MIT in the USA. This is necessary for us to provide our services to those in groups A and B

And may include:

- Mailing houses, printers, event organisers, venues.
- Software service providers, including cloud-based 'software as a service' providers who can ensure that the data is kept within the UK/EU and/or only shared with US-based institutions who can meet European standards of data protection. This includes databases, alumni networking platforms, payment providers and email marketing systems.
- Organisations who assist us with improving our organisational effectiveness, strategy, planning, or provide business intelligence.
- Individual volunteers who are directly assisting the Trust.

These organisations act as our data processors but are typically data controllers in their own right and may also share data with other organisations in order for them to fulfil their service with us.

Individual data controllers publish their own privacy notices and policies and relevant Subject Access Requests may be made directly to these third parties.

How we protect your data

The Trust takes precautions to safeguard your personal information against lost, theft and misuse and has technical and procedural steps, processes and procedures in place to protect access to physical and digital personal data.

Where the Trust relies on external data we ensure that compliant contracts are in place. We make active efforts to engage service providers who are based within the UK or European Economic Area (EEA). Where this is not possible we may need to engage service providers resulting in your personal data being transferred outside the EEA. Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we will transfer data to them where this is essential for us to provide you with our scholarship provision as part of our operational processes. We may transfer data to other providers in the US if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, and we are not performing the process as part of our contractual obligation to you, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

In addition to the above, your data may be temporarily transferred outside of the EEA during the course of our staff travelling abroad with personal data (for example meeting contact information and emails). There are appropriate safeguards in place to ensure the protection of your data – including encryption rendering the data unreadable in the case of loss or theft.

How long we keep your data

i) Group A

Data provided by applicants will be kept in full until that particular year's scholarship competition is concluded. Thereafter a list of applicants, email addresses, educational information, and programmes applied for in the US will be retained for seven years.

Beyond that point, full but unattributable lists of the UK universities from which applications have been received and the programmes applied for will be retained as a record of that year's competition, along with statistical analysis of that particular year's applicant pool.

All other personally-attributable data relating to applicants who have been unsuccessful will be destroyed. School information and census data, if given, may be the basis for particular reports, for instance with regard to equal opportunities. These reports will also be unattributable.

ii) Groups B and C

The Trust considers its relationship with all successful applicants, alumni, donors and supporters to be life-long and will retain your data indefinitely unless you request otherwise.

The legal basis for processing your data

We will only use your personal data where the law allows us to do so. The legal basis for processing this data is typically fulfilment of contract or legitimate interest. In some exceptional circumstances, the Trust relies on consent to process this data.

- Where we use legitimate interest as the basis for the processing stated in this privacy notice, we have carefully considered how we process your data to ensure that we carry out our activities with a focus on the interests of our alumni, donors and supporters, and in the most efficient and effective way.
- Where we need to perform an activity under a contract we have entered into with you. Information processed for this purpose includes, but is not limited to, the information you provide when you register for an event, or to enable us to process a donation.
- Where your consent is required, you can withdraw your consent at any time and we will stop any processing of your personal data requiring your consent.
- Sometimes it is necessary for us to process data to comply with our legal obligations, such as: to claim Gift Aid on your donations; to respond to the Charity Commission or ICO in relation to audits or official investigations.

Your legal rights and choices in connection with your data

As a data subject, you have the following rights under applicable Data Protection laws:

- Right of Access - the right to be informed of and request access to the personal data we process about you.
- Right to Rectification - the right to request that we amend or update your personal data where it is inaccurate or incomplete.
- Right to Erasure - the right to request that we delete your personal data.
- Right to Restrict - the right to request that we temporarily or permanently stop processing all or some of your personal data.
- Right to Object -- the right, at any time, to object to us processing your personal data on grounds relating to your particular situation. -the right to object to your personal data being processed for direct marketing purposes.
- Right to Data Portability - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service;
- Right not to be subject to Automated Decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

If you want to apply any of your rights to processing, please contact us at info@kennedytrust.org.uk. We will stop the processing as soon as we can. Please note, that where there is a legal, contractual or statutory requirement for us to process your data, we may not be able to comply with your request.

If you are dissatisfied with the way we have used your information, please email us at info@kennedytrust.org.uk. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the UK GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office at the ICO website (<http://ico.org.uk/concerns/>).

Contact us

If you have any questions about this privacy notice or about your personal data, please contact us by email via info@kennedytrust.org.uk or by telephone on 020 7222 1151.