

Royal Commission for the Exhibition of 1851 Applicants, Award Holders & Alumni Privacy Notice

About this document

This privacy notice explains how the Royal Commission for the Exhibition of 1851 ("we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of those currently applying for our awards ("Applicants"), those putting forward, acting as referee for or otherwise supporting Applicants ("Recommenders"), those currently in receipt of our awards ("Award Holders") and those in our alumni community ("Alumni") (together, "you", "your").

Royal Commission for the Exhibition of 1851 (a Royal Charter body, and registered charity number 206123, and which is registered with the UK Information Commissioner's Office with registration number Z8305954) is the data controller of your personal data and is subject to the Data Protection Act 2018 ("DPA") and the General Data Protection Regulation (the "GDPR").

How we collect your information

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 (or supporting someone else in making) an application for one of our awards;
- when you submit a formal application for an award, for example by applying for one of our fellowships, or provide supporting statements for someone applying for an award, for example by providing a reference;
- from third parties, for example your previous or current institutions of study, and your proposed Fellowship university, in order to verify details about you and/or your application for an award;
- when you communicate with us by post, telephone, email or via our website, for example in order to make enquiries about an application or an award;
- in various other ways as you interact with us during your time as an Applicant, Award Holder, Recommender or member of our Alumni community, for example by submitting annual 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;
 - your image and likeness, including as captured in photographs taken for business purposes;
 - details of your education
 - details of your professional activities and employment, including work contact details;
 - education and employment related references;
 - details of honours, awards, publications etc.;
 - information you have publicly shared on social media;
 - 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 award payments and expense reimbursements;
 - your and / or your host institution's bank account number, name and sort code (used for processing award payments, grants and donations);
 - details of any donations or bequests you choose to make, including gift amount, purpose, date, method of payment, cheque numbers or other payment references;
 - Tax (residence) status and Gift Aid declaration information;
- and any other information relevant to a Fellowship application or award.

We may also collect sensitive personal data, including information concerning your health and medical conditions (e.g. disability and dietary needs), where this is necessary for the provision of an award to you.

If at any time you provide personal or other information about someone other than yourself (e.g. your referees or supervisors), you warrant that you have that person's consent to provide such information for the purpose specified.

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 or support an application for one of our awards (for example, to send answers to any questions you have about an award);
- when you submit a formal application for an award, or formally support such an application, in order to assess the applicant's eligibility for that award;

- if you are successful in your application, to provide you with an award 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 award, and we may send you certain information, stories and news, for example in the form of publications, e-newsletters and invitations to events, where this is necessary for the performance of the award terms and conditions);
- to deal with any concerns or feedback you may have;
- 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 and pursuing our mission as set out in our Royal Charter (our founding constitutional document) and in our Supplemental Charter.

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

- for administrative purposes, for example in connection with payments made to you, donations made by you or an event you have registered for or attended;
- to conduct surveys, focus groups and other research;
- for internal record-keeping, including the management of any feedback or complaints;
- to monitor and evaluate the performance and effectiveness of our awards;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- to hold your information and use it to consider the updates that are most suitable for you, in order to keep you informed (by letter, telephone, email and other electronic means – subject to having your consent for being contacted by electronic means (see below)) of information, stories and news which may be of interest to you (for example, updates about our Award Holders and their studies, work and other achievements);
- to publish stories and news on our website at <https://www.royalcommission1851.org/> and to consider the updates that are most suitable for you, for example, information about our awards and our activities, in order to determine which publications, e-newsletters, invitations to events and details of opportunities to assist the Commission through mentoring, outreach or similar activities are suitable to send to you. We may send to you by post, email and potentially by other means, depending on your communication preferences from time to time, and subject to having your consent for being contacted by electronic means (see below);
- to further our charitable objectives, including by holding your information as a past or potential donor to the Commission, and in order to offer you the opportunity to donate to or make a bequest in support of the Commission's work, particularly in pursuit of our core mission, which is to "increase the means of industrial education and extend the influence of science and art upon productive industry" (as set out in our Supplemental Charter of 1851);
- transferring information to HM Revenue and Customs in respect of any Gift Aid claims;

- to provide mechanisms for Award Holders and Alumni to network in their local area and connect around academic, professional or social interests;
- to provide mechanisms for Award Holders and Alumni to keep each other informed of new activities, ventures and opportunities; and
- for archival preservation and historical research.

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 and regulatory obligations, such as compliance with anti-money laundering laws and tax reporting requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

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 Alumni);
- we have your specific or, where necessary, explicit consent to do so.

In particular, with your consent, we may process your personal data to provide you with information about our awards and our activities, opportunities to donate to the Commission's work, and other information, stories and news which may be of interest to you, for example, by sending you publications, e-newsletters, invitations to events and details of opportunities to assist the Commission through mentoring, outreach or similar activities. We may send you these communications by electronic means (meaning, principally, by email) only with your specific consent. If you do not wish to receive such information, or if you wish to receive this information only by certain means of communication, please let us know now or at any time in the future, and your communication preferences will be updated. (Where possible, we will provide you with the means to update your communication preferences yourself.)

If we lose touch with you over time, we may use publicly available information, e.g. from news media and social media sites or your own web page, to ensure that our contact details for you are up to date, allowing us to continue to communicate with you about certain events and activities which may be of interest 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 and contractors 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 award application process; the award itself (including market research with award holders); our alumni network; and our archive;
- internal and external auditors (our external auditors are currently Kingston Smith LLP);
- when the Commission 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;
- where you have given your consent for us to do so, for example to the Royal Society or a similar organisation so that you may be invited to events which they are organising or to other Award Holders and Alumni where you have given your consent for limited personal data to be so shared to facilitate networking and exchange of information.

Other than as described above we do not share your data with third parties. We do not sell your personal data to other organisations.

A list of the data processors with whom we currently share personal data and the rationale for doing so is provided below:

Cottage Labs LLP (provision of the Commission's main website)
 Fluent Technology Ltd (provision of the Commission's applications website)
 KIT United (provision of the Commission's alumni platform, Hivebrite)
 Axiell Ltd (provision of the Commission's CALM archive system)
 Microsoft Azure Cloud (website hosting)
 Google Cloud Platform (hosting of the alumni platform, Hivebrite)
 Amazon AWS (website hosting and hosting of the alumni platform, Hivebrite)
 Sendgrid (sending of emails from the alumni platform, Hivebrite)
 Sentry (production of error logs from the alumni platform, Hivebrite)
 SendBird (provision of direct messaging facilities within the alumni platform, Hivebrite)
 Datadog (log management within the alumni platform, Hivebrite)
 Google Analytics (website analytics)
 Airbrake (production and storage of error logs for the alumni platform, Hivebrite)
 Sage UK Ltd (accounting information for award payments and expense reimbursements)

International data transfers

As a matter of course, we do not transfer your personal data outside of the European Economic Area. 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. In such circumstances, we will consider whether any additional measures are required in order to give adequate protection for the information when it is transferred outside of the EEA.

The data processors we use have undertaken that they will only transfer data outside the EEA where the transfer is subject to an adequacy decision (in accordance with Article 45 of the GDPR) or appropriate safeguards (in accordance with Article 46 of the GDPR) or binding corporate rules (in accordance with Article 47 of the GDPR).

How long your information is kept

When you formally apply for an award, or formally support an application for an award, through the on-line 1851 Awards Application Portal on the FlexiGrant platform maintained by Fluent Technologies Ltd you set up an account on the FlexiGrant platform. Personal data entered into the system is maintained indefinitely until such time as you alter or delete it or close your account on the system. This enables Applicants and Recommender to submit / support multiple / repeat applications over time without having to re-enter personal data.

All other personal data relating to unsuccessful applicants is deleted within one year of the end of the application process, except that a record of the applicant's name, nationality, proposed project title/degree course, PhD university (where relevant), proposed Fellowship institution, host company (where relevant), project mentor / academic and industrial supervisors (where relevant) and progress through the application process is retained for the Commission's internal statistical / research purposes.

For Award Holders who do not become part of our alumni network (e.g. those in receipt of Special Awards), we retain your personal data for a period of two years after you have finished complying with all the conditions of your award for the purpose of assessing and reporting the impact of the award, then permanently in our historical archive for the purpose of future historical research (information in the archive is not put to use for the shorter of 50 years after death or 100 years after the start of an award).

We will retain Alumni personal data indefinitely in order to support your life-long relationship with the Commission and subsequently as part of our historical archive for the purpose of future historical research (information in the archive is not put to use for the shorter of 50 years after death or 100 years after the start of an award). However, if you decide at any time that you do not wish to receive communications from us, or from other Award Holders and Alumni, please let us know and we will update your communication preferences accordingly. (You are also able to update your communication preferences directly through the alumni system provided through the Hivebrite platform.)

Your rights

Under the GDPR you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications.
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (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 the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Secretary using the contact details set out below. 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 provide all or some aspects of our services to you and/or it may affect the provision of those services.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: www.ico.org.uk.

Contact us

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact our Secretary:

- by email: royalcom1851@imperial.ac.uk;
- by telephone: 020 7594 8790;
- or by post: The Secretary, Royal Commission for the Exhibition of 1851, 453
 Sherfield Building, Imperial College, London SW7 2AZ.