

## The Irvine Laidlaw Foundation Fair Processing Notice

This is a fair processing notice ("**Notice**") which tells you how the Irvine Laidlaw Foundation collects and uses your personal information and how it complies with data protection laws, including the EU General Data Protection Regulation 2016/679 or "**GDPR**" and Data Protection Act 2018 (together, the "**data protection laws**").

Under the data protection laws, the Irvine Laidlaw Foundation (the "**Foundation**", "**we**" and "**us**") is a controller of your personal data we collect in connection with your scholarship or your use of our websites. As a Controller, we must provide you with information about the collection and use of your personal data, including:

- the purposes for processing;
- the retention periods; and
- who we will share it with.

This Notice provides you with this information and explains what personal information the Foundation holds, in addition to your rights regarding this information. It's important that you read it carefully, together with any other privacy notices and information that we provide you from time to time.

We will collect and process your personal information primarily from you in accordance with this Notice, which also aligns with data protection/security requirements.

This Notice does not form part of your scholarship, or any other contract or agreement between you and us.

### The Foundation's data protection responsibilities

As stated above, the Irvine Laidlaw Foundation is the controller of your personal information for the purposes of this Notice and can be contacted using the contact details at the end of this Notice. We want to be very transparent about our use of your information so that you understand how and why we collect and use it and so that you know that you can always trust us with it.

As a controller, we make decisions about what personal data to collect about you and the reasons we use it. We can only do this if we comply with the data protection law and our legal obligations.

"**Personal data**", sometimes called personal information, is any information that relates to an identifiable natural person. Your name, address, contact details and education records are all examples of your personal data, if they identify you.

"**Sensitive personal data**" or "**special categories of personal data**" – is personal information which relates to specific issues which are more privacy sensitive: details about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data about physical and/or mental health, sexual orientation, as well as information relating to actual or suspected criminal convictions and offences. Examples may include accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, or dietary requirements and allergies.

"**Process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

This Notice applies only to personal information processed by or on behalf of the Foundation. Where our website or scholar portal contains links to other sites, those sites are separately responsible for any data you provide them. We recommend you check their own privacy policies if you are providing them with your personal data.

## **What types of personal information might the Foundation collect about me and where do we get it from?**

We collect many different types of personal data about you for lots of reasons. We cannot process your application for a scholarship or administer your scholarship without it. Where our collection of your personal data is optional, we will make this clear in any forms collecting details and these fields can be left blank. The **Annex** sets out further information about what personal data we process and where we collect it from.

You provide us with personal data directly in your application for a scholarship, such as your name, email address and University. You also provide us with personal information when you create a profile on our online scholar portal, such as your chosen display name and your photograph, and when you correspond with us or interact with us on social media (whether through the scholar portal or directly via such social media). We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, such as your employer or your University should you chose to apply for a scholarship and where you are successful in that application as part of our ongoing funding.

We may also obtain information about your computer, including where available your IP address, operating system and browser type in accordance with our Cookies Policy which is available here: <https://laidlawscholars.network/pages/cookie-policy>

## **On what basis does the Foundation process my personal data?**

We process your personal data for particular purposes in connection with your scholarship, and the management and administration of our business. We are required by law to always have a permitted reason or justification (called a "**lawful basis**") for processing your personal data. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

There are six such permitted lawful basis for processing personal data. The **Annex** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing. These bases may be:

**Consent:** You have given your consent to the processing;

**Contract:** It is necessary to perform your scholarship contract;

**Legal obligation:** It is necessary for us to comply with a legal obligation;

**Legitimate interests:** It is necessary for our legitimate interests or those of third parties;

**Vital interests:** It is necessary in an emergency to save your life or protect you from serious harm (or to protect someone else); or

**Public interest:** It is necessary to perform a task in the public interest.

Please note that where we have indicated in the **Annex** that our processing of your personal data is either necessary for us to comply with a legal obligation or necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it, and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

## **Special category personal data**

We are required by law to treat certain categories of personal data with even more care than usual. These are the special categories of personal data that we explained earlier in this Notice. Additional different lawful bases apply to them. The bullet points below also set out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. We have included criminal related data in this category.

We do not systematically collect information which would be characterised as sensitive, for example health information. However, we will process this information if it is provided to us by you or on your behalf voluntarily, for instance when you include it in content to be included on our internal or external websites, or on the Foundation's scholars network. We would ask that you do not give us sensitive information unless you give your express authorisation for us to use it.

We may record such information if we believe that you, or anybody using or visiting a site, need extra care, for example, because of your or their age, health, disability or financial circumstances.

The bullet points below explain the legal basis on which we use this type of personal data for the relevant purpose:

- **Explicit consent:** You have given your explicit consent to the processing;
- **Vital interests:** It is necessary to protect the vital interests of you or another person if you are physically or legally incapable of giving consent;
- **Legal claims:** It is necessary for our establishment, exercise or defence of legal claims; or
- **Substantial public interest:** It is necessary for reasons of substantial public interest.

### **Is my personal data accurate?**

It is your responsibility to make sure the personal data you provide to us is complete and accurate and you must help us to keep it accurate and up to date. If any of the personal data you have given to us changes, such as your contact details, please inform us without delay by contacting your university Laidlaw Team at [{insert your University Laidlaw Team Generic e-mail here}](#).

### **Will the Foundation share my information with other people?**

From time to time we may need to pass your personal data on to trusted third parties.

We may share your personal information with other Universities where it is necessary for us to do so for the purposes set out in the **Annex**.

We may also share your information:

- with your University;
- where we need to share your information with third parties to provide services you have asked for, for example to create your account on our portal;
- if we have been asked to provide information about you for legal or regulatory purposes;
- if we are under a duty to disclose or share your personal information in order to comply with any legal regulations or good governance obligations;
- in order to enforce or to protect our rights, property, or safety, or that of our customers or other persons with whom we have a business relationship;
- to purchasers or prospective purchasers in relation to a disposal of our business or assets;  
or
- to defend legal claims.

Finally, we may use third party service providers to support our provision of the service. This includes for the provision of our business functions, including (without limitation) IT support, hosting our data on cloud platforms, legal, accounting, audit, consulting and other professional service providers, and providers of other services related to our business. Portions of our services may be provided by organisations with which the Foundation has a contractual relationship, including subcontractors,

and, accordingly, your personal information may be disclosed to them. We only provide these organisations with the information that they need to be able to perform their services.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (a) IT support, website and data hosting providers and administrators;
- (b) consultants and professional advisors including legal advisors and accountants;
- (c) courts, court-appointed persons/entities, receivers and liquidators;
- (d) business partners and joint ventures;
- (e) insurers; and
- (f) governmental departments, statutory and regulatory bodies.

Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into or have in place a written agreement with our service providers which will impose appropriate security standards on them and restrict how they are able to process your personal information.

### **Where in the world is your personal data transferred to?**

Some of the organisations that we share your personal information with may process it overseas. If any service provider is based outside of the European Economic Area, we will only transfer personal data to them if:

- the country in which the service provider is based ensures an adequate level of data protection for personal data or the provider is either a current subscriber to the EU/US Privacy Shield;
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract (like the contract terms sometimes called Model Contract Clauses issued by the European Commission) with the recipient (please contact your university Laidlaw Team if you wish to obtain a copy of these);
- the transfer is necessary for one of the reasons specified in data protection law, such as the performance of a contract between us and you; or
- you consent to the transfer.

If you would like more detail about such safeguards, please contact [your university Laidlaw Team](#).

### **Data anonymisation and aggregation**

We may anonymise or aggregate your personal information to better protect your privacy, or to ensure that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use the anonymised or aggregated data for statistical analysis and administration including analysis of trends, for example, to help us understand how our scholars are progressing in their professional or academic careers, to carry out actuarial work, to tailor funding and other services and to conduct risk assessment and analysis of costs and charges in relation to our services. We may share anonymised or aggregated data with third parties.

### **How do we keep your personal data secure?**

The security of your personal data is very important to us and we take this matter very seriously. We will take steps (as required by data protection law) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. We will ensure that third parties to whom we disclose your personal data will do so as well. We will use appropriate procedures and security features to process and protect your information. We have in place a robust framework to ensure the security of your data.

**How do we communicate with you?**

We will use your personal data to communicate with you:

- to administer our relationship with you;
- to respond to any questions or complaints that you may have; and
- provide you with information about our products, services, promotions and/or offers where you request we do so.

We may also (with your consent) provide your contact details to third parties so that they might send you details of their products, services, promotions and/or offers directly.

If you do not wish to receive direct marketing communications from us, you can opt-out at any time by either following the instructions within the communication, or by contacting your university Laidlaw Team.

If you decide at any point that you no longer wish to receive direct marketing communications from a third party, please contact that third party directly or follow the instructions (if any) given in their communication to you.

**What are your rights in relation to your personal data and how can you exercise them?**

You have certain legal rights in relation to any personal data about you which we hold.

Where our processing of your personal data is based on your **consent**, your consent is entirely voluntary and you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary to perform a task carried out in our **legitimate interests** you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It

Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details or telephone number.	covers only the personal data that has been provided to us by you.  Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

If you wish to exercise any of these rights please contact your university Laidlaw Team in the first instance.

Please contact us if you have any concern about how your personal information is processed at your university Laidlaw Team and we will try to resolve your concerns. However, if you consider that we are in breach of our obligations under data protection laws, you can raise a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

## Login details

We will collect and process your personal information as necessary to set up and administer your sign up to, and use of, the login facility available on our website and/or our scholar portal. We will use cookies to "remember" the machine or other device you use to access our website (in accordance with our cookies policy which is available here: <https://laidlawscholars.network/pages/cookie-policy>).

When you use your account on our site or scholar portal, you are required to adhere to the following security procedures in relation to your username and password, which are referred to as "login information":

- Keep your login information secret and secure at all times and do not disclose it to any other person or allow any other person to use it;
- Do not write down or record in any form your login information or store it on any software, including a password save feature;
- Destroy any notice from us concerning your login information as soon as you have read and understood it;
- Should you become aware or have reason to suspect that your login information has been lost or disclosed to, or seen or accessed by, someone other than yourself, immediately notify

us at the following email address [{insert your University Laidlaw Team Generic e-mail here}](#);

- Do not leave your computer or other device unattended while you are using the login facility available on our website or let anyone else use your computer or other device unless and until you have logged out; and
- Use particular caution if you access the login facility available on our website from a public or shared computer or device, to ensure that other people are not able to see your login details.

### **How long will the Foundation keep information about me?**

We will only retain your personal data for a limited period of time, which is generally for up to 6 years after your last interaction with us. This will depend on:

- any laws or regulations that we are required to follow;
- whether there is an ongoing request or query at the time, or we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

In certain circumstances, we may keep your personal data for longer than 6 years. This includes details about your employer, job title and salary, for the purpose of understanding the career advancement of our scholars. Such information will be anonymised or aggregated in such a way that you are not identified or identifiable from it (see the **Data anonymisation and aggregation** section above for further information).

Please note that marketing materials may remain on the website for as long as those promotional material are used and may exceed the retention period of 6 years.

### **Changes to this policy**

Data security is important to us, and as such we will keep this policy under review. We may, therefore, change this policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices, and to update you about changes to the types of personal data we process and/or the way in which it is processed. We will update the date at the top of the policy accordingly.

We encourage you to check this policy for changes when you revisit our website or use our app.

### **Contact us about privacy**

We have a dedicated data protection officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection law. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data; please mark your communication as "Data Protection Enquiry".

-----  
**The Irvine Laidlaw Foundation**  
**Publication Consent (to be provided underneath or alongside fair notice wording)**

I **[INSERT NAME]** have read the **Irvine Laidlaw Foundation** (the “**Foundation**”) Fair Processing Notice and hereby provide my consent to the Foundation as a controller of my personal information processing my personal information in the following ways:

1. To have any photographs taken of me during my time as a Laidlaw Scholar to be published on the Foundation’s internal and public website for the purpose of the Foundation’s marketing and our activities, events and services.

Please initial here to confirm your acceptance.....

2. To have the name of and details relating to my research project published on the Foundation’s internal and public websites, as well as listed in the scholar portal at the Foundation’s discretion, for the purpose of providing an interactive and informative network for our scholars.

Please initial here to confirm your acceptance.....

3. To have photos, videos and content I upload to the Foundation’s internal websites and the Laidlaw network displayed on those websites and the network, for the purpose of providing an interactive and informative network for our scholars.

Please initial here to confirm your acceptance.....

4. Where any photos, videos and content I upload to the Foundation’s internal websites and the Laidlaw network contain any special category data, for that special category data to be displayed on those websites and the network, for the purpose of providing an interactive and informative network for our scholars.

Please initial here to confirm your acceptance.....

5. Where I provide information about my employer, job title and salary, for the Foundation to use this information in an anonymised or aggregated basis in a statistical analysis for the purpose of understanding the career advancement of our scholars.

Please initial here to confirm your acceptance.....

You will not suffer detriment if you do not want to consent to any of the processing set out above, and you have no obligation to consent to any of that processing.

I am aware that I may revoke my consent to the processing of my personal data in any of the ways I have consented to above at any time. If you would like to do so, please contact us using any if the following methods:

E-mail: **{insert your University Laidlaw Team Generic e-mail here}**.  
Telephone: +44 (0)1334 467459  
Postal address: **{insert your university Laidlaw Team address}**

I am also aware that where the Foundation has another lawful ground for processing my personal data under the relevant data protection legislation, the Foundation may continue to process my personal data notwithstanding my refusal to give or withdrawal of consent.

Signed.....

Name.....

Dated.....

## Annex

Defined Term	Meaning
Core ID Data	Title, Full Name, date of birth
Core Contact Data	Personal home address, personal email address, home and personal mobile telephone numbers

Personal Data	Lawful Basis	Source of information
<b><i>Processing your scholarship application</i></b>		
Core ID Data Core Contact Data Education (including qualifications) University and course details Job history and experience CV, application, interview questions, answers and notes Test results and results of benchmarking Selection matrices (completed during/following interviews)	Legitimate interests in allocating funding to deserving candidates	Your application Your university Publicly available information from professional online resources e.g. LinkedIn
<b><i>Administering your scholarship</i></b>		
Core ID Data Core Contact Data	Contract	Your application
<b><i>To administer scholarship payments</i></b>		
Core ID Data Bank Details Salary Benefits Deductions Expenses claimed and reimbursed	Contract  Legitimate interests in providing funding	Information you have provided us with Your contract of employment Our payment records
<b><i>Setting up your profile on our online scholar portal and/or the Laidlaw network</i></b>		
Core ID Data Your chosen display name Your photograph Your biography Your job title Your department Your career history	Contract  Legitimate interests in providing a network for our scholars	You Publicly available information from social media sites e.g. Facebook, LinkedIn

Personal Data	Lawful Basis	Source of information
Your connections, influencers and followers Your group Any social media profiles you link to your profile including Twitter, LinkedIn, Facebook, Google+ or your own website		
<b>Your use of the online scholar portal and/or the Laidlaw network</b>		
Work contact information Images and photos Videos Details of your research project Content you share on our online scholar portal and/or the Laidlaw network Your IP address Details around how you use the Foundation's digital products or services	Consent  Legitimate interests in providing a network for our scholars	You Publicly available information from social media sites e.g. Facebook, LinkedIn Your computer or device Cookies or similar technologies on your device - find out more about cookies and how the Foundation uses them in our Cookies Policy which is available here: <a href="https://laidlawscholars.network/pages/cookie-policy">https://laidlawscholars.network/pages/cookie-policy</a>
<b>Resolving issues when you report a problem with our website, scholar portal, the Laidlaw network or our services</b>		
Core ID Data Your contact data Your chosen display name Information you provide when reporting a problem	Contract  Legitimate interests in providing a good service	You Your computer or device
<b>Recording your career development and advancement</b>		
Core ID Data/employee identification number Job title Salary Statements/opinions Performance reviews	Consent  Legitimate interests in understanding the impact of the Laidlaw scholarship on careers	You Your University Your employer
<b>Interacting with you on social media</b>		
Core ID Data	Consent  Legitimate interests in developing an engaging social media profile	You Publicly available information from social media sites e.g. Facebook, LinkedIn

**Publishing information about Laidlaw Scholars on our internal and external websites**

<p>Core ID Data                  Your photographs                  Your chosen display name                  Your videos                  Details of your research project                  Content you share on our online scholar portal and/or the Laidlaw network                  Information I provide about my employer, job title and salary for the Foundation to use in an anonymised or aggregated basis in a statistical analysis for the purpose of understanding the career advancement of our scholars (on the basis of my consent)</p>	<p>Consent                   Legitimate interests in promoting the Foundation and what we do and providing a network for our scholars</p>	<p>You                  Your University</p>
--	---	---

**Providing you with marketing where you request it**

<p>Core ID Data                  Core Contact Data                  Your preferences</p>	<p>Consent                   Legitimate interests in marketing our services</p>	<p>You</p>
--	---	------------