

APRIL 2021 | INTERNAL USE ONLY

SG UK FOUNDATION

Privacy Notice

We are **Societe Generale UK Foundation (SG UK Foundation or SGUKF)**, the corporate charitable foundation associated with Societe Generale UK (SGUK). We refer to ourselves as the Foundation in this notice. The Foundation funds a number of key strategic projects as well as providing matching donations to support SGUK staff's charitable, fundraising and volunteering efforts.

This notice provides information about the types of personal information we collect about you during the course of our operations and charitable activities. It also provides information about how we will use your personal information and your rights over your personal information.

The Foundation is a controller in relation to personal data about you which is processed in accordance with this privacy notice. Controllers are the main decision-makers in relation to your personal data – they exercise overall control over the purposes and means of the processing of personal data.

This notice is about how the Foundation processes personal information about you. If we start a new project or activity, we may provide you with new privacy notices with more information.

Please click on the links below for more information about the different types of personal information we collect and how it is used.

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1. WHO WE ARE AND HOW TO GET IN TOUCH

We are Societe Generale UK Foundation, a charitable foundation based in England. Our charity number is 1196579. Our principal place of operation is: One Bank Street, London, E14 4SG.

If you would like to know more about what personal information we have about you, how we use it, or if you would like to ask us a question, please contact us at:

Email: LON-SGUKF-DATA-PROTECTION@socgen.com

Post: One Bank Street, London, E14 4SG.

2. WHAT IS PERSONAL INFORMATION?

When we use the term **personal information**, we mean any information that could be used to identify you. At its simplest, this includes your name and your email address. Personal information will also include records of your participation in the SGUK matching programme, records of your contribution in board meetings (if you act as a trustee or other supporter), and information about the impact of our funding on you (if you are a beneficiary of a funding project).

3. WHOSE PERSONAL INFORMATION WE USE

We collect and use personal information about people who are involved in the Foundation, or who we feel could be useful to the Foundation. For example:

- People who provide operational support for or on behalf of the Foundation
- Prospective, present and past trustees of the Foundation
- SGUK staff, for example, who participate in the SGUKF matching programme or support the Foundation in other ways
- Contacts at delivery partners for our funding projects
- Contacts at suppliers and service providers
- Individuals associated with applicants or beneficiaries of our funding programmes
- Contacts at charities or other charitable organisations who send in speculative requests for support

You are not under any obligation to provide us with your personal information. But if you do not do so, you may not be able to partake in the activities of the Foundation (for example, the SGUKF matching programme).

4. SOURCES OF PERSONAL INFORMATION

We will collect your personal information from three sources:

(a) Directly from **you**

For example, when you provide us with your contact information.

(b) **Indirectly** from another source

For example, from SGUK as part of the SGUKF matching programme.

(c) When it is available **publicly**

For example, if you support our projects publicly, we may keep a record of this.

5. THE PERSONAL INFORMATION WE COLLECT AND USE

The personal information that we collect and use about individuals differs depending upon our relationship with the individual. We have set out categories below.

Trustees and operational staff

The information we collect about **trustees** and **operational staff** of the Foundation includes, but is not restricted to:

- personal details such as full name, address, personal email address and phone numbers
- your photograph
- your date of birth and gender
- information gathered via the recruitment or procurement process, for example your CV or your education and work history
- the terms of your relationship with the Foundation (including your salary and any benefits, if relevant)
- references from former employers, clients or contacts
- your start date
- records of your signature (when you sign a formal document)
- your leaving date or the end of your appointment
- information about your external interests (for example, to establish if there is a conflict of interest)
- records of your interaction with the Foundation (for example, your participation in board meetings, etc)
- details of formal and information proceedings involving you such as letters of concern, disciplinary and grievance proceedings
- performance management information (whether from appraisals or board reviews)
- records of your annual leave and other absences (including sickness)
- internal and external training undertaken
- information about your use of information technology systems (including email, internet and phones) connected to us
- any equipment assigned to you
- location of employment/work
- information about third parties and their declared interests where needed for legal or audit purposes (for example, when witnessing the signature of a deed)

SGUK staff

The information we collect about SGUK staff (whether as part of the matching programme or if they otherwise provide support to the Foundation) includes, but is not restricted to:

- personal and professional details such as full name, address, email address and phone numbers
- information about your role with SGUK
- records of your activity (e.g. donations or other fundraising and volunteering) which is relevant for the matching programme
- evidence of your activity (such as link to your fundraising

page or confirmation email from the charity on your volunteering hours) which is relevant for the matching programme

- records of the support you provide to the Foundation (for example, if you help with the SGUK audit programme)
- information about your external interests (for example, to establish if there is a conflict of interest)

Delivery Partners, Suppliers and Service Providers

The information we collect about delivery partners, suppliers, and service providers includes, but is not restricted to:

- personal and professional details such as full name, address, email address and phone numbers
- information about your relevant background (including references)
- details of your relationship with the Foundation (for example, the nature of the collaboration or the services to be provided)
- the terms of your relationship with the Foundation (for example, a contract for services)
- records of our correspondence with you
- records of your signature (when you sign a formal document)

Programme Applicants/Beneficiaries

Our delivery partners provide us with information about the applications for our programmes (for instance for SHAKE Climate Change). The information that we collect about applicants and beneficiaries includes, but is not restricted to:

- personal details such as full name, address, personal email address and phone numbers
- information about your relevant background (including your qualifications, references and information included on your LinkedIn profile)
- information about your association with the proposed application
- information about your organisation or company including financial information
- (if successful) information regarding the delivery of the project which receives our funding
- Photos and case studies

6. MORE SENSITIVE PERSONAL INFORMATION

Certain types of personal information are sensitive and need more protection. For example, information about your race or ethnic origins, political opinions, sex life or sexual orientation, religious beliefs, health information, biometric and genetic data. There are also special rules about the use of criminal information (information about criminal convictions or allegations about criminal convictions).

We will not usually collect these types of personal information about you. We will only process these types of personal information about you if we have a valid reason for doing so and only if the law allows us to do so. One example is if you are operational staff of the Foundation and take a

leave of absence due to illness or if a Foundation related person is volunteering in circumstances which require a criminal record bureau check (DBS check for working with children or vulnerable adults).

7. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We use your personal information to help us run the Foundation. Specifically, we use your personal information to:

- administer grants from the Foundation (including reviewing applications and background information)
- operate the SGUKF matching programme, including but not limited to instructing CAF (Charities Aid Foundation) Bank to distribute funding
- identify future projects and delivery partners which align with our interests
- manage our relationship with SGUK, including our reliance on their staff and systems
- work with delivery partners to ensure the delivery of our projects, including SHAKE Climate Change
- study and keep track of the progress of the Foundation, so we can report on our impact
- keep accurate records for the purposes of fulfilling our legal obligation as a charity
- promote the Foundation and communicate on the Foundation's charitable activities within SGUK or publicly
- analyse, evaluate and improve the Foundation's operations (including our overall strategy)
- run the Foundation (for example, procuring services, considering and applying for new avenues of funding, considering new partnership and administering our existing relationships with partners)
- manage the Foundation's finances (for example annual audit and accounts, updating banking mandates, undertaking SGUK reviews)
- deliver the Foundation governance procedures (for example, trustee appointments and resignations, conflict of interest declarations, formal deeds and agreements)
- satisfy legal obligations which are binding on us (for example, reporting to the Charity Commission)
- consider and respond to any complaints or requests made to us
- establish, defend or enforce legal claims.

8. OUR LAWFUL BASES AND GROUNDS FOR USING YOUR PERSONAL INFORMATION

We can only use your personal information if we have a valid reason. This is known as a "lawful basis of processing". Different lawful bases of processing will apply to the different ways in which we use your personal information. Below we explain the lawful bases which we think apply to our use of your personal information:

(a) Legal obligation

This is where we need to process your information to comply with a **legal obligation**. For example, we

are under a legal obligation to report to the Charity Commission about our charitable activities.

(b) **Contractual basis**

We may rely on this basis where it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to you entering into a contract.

(c) **Legitimate interests**

This is a flexible lawful basis. It allows us to use your personal information, provided that:

- (i) We have a **good reason** to do so. For example, we may wish to publish information about the types of people who benefit from our funding. Additionally, we will need to use personal information to handle any concerns or queries raised.
- (ii) It's **reasonably necessary** for us to use your personal information for the reason we've identified above.
- (iii) It fits with **your rights**, and doesn't affect you unfairly. Your rights are explained in section 12 below.

When we rely on legitimate interests as a lawful basis, our use of your personal information must be fair and balanced, and we need to consider the points above. You may choose to object to processing based on legitimate interests (see section 12 below for details).

(d) **Consent**

This is where we ask for your **permission** to use your personal information for a specific purpose. For example, we may ask to use a photo in an impact report.

You always have the right to withdraw your consent in respect of any future processing based on your consent (i.e. future processing from the point at which you notify us that you would like to withdraw your consent. Just contact us using the details set out in section 1.

- (e) Where we need to **protect** your or someone else's interests
- (f) Where it is needed in the **public interest**, for example fraud prevention

We are required to have an additional ground or condition when we use more sensitive personal information, as discussed in section 6.

There may be circumstances which mean we need to use sensitive personal information about you for instance where you disclose to us sensitive information about your health in connection with a grant application on behalf of an organisation or where you disclose to us information about a disability as part of your dealings with us in your capacity as a trustee. In which case, we would ensure we have explicit consent, or we will make sure we have legitimate grounds to use this sensitive personal information. For example, if we suspect fraudulent activity in relation to our funding, we may use criminal data about alleged criminal activity in order to act in the **substantial public interest to prevent or detect an unlawful act**.

9. WHEN WE SHARE YOUR PERSONAL INFORMATION

We rely upon SGUK's systems and staff in order to run the Foundation. This means that we share your personal information with SGUK. We have an agreement in place with SGUK which governs the shared resources, and includes protections for your personal information.

We also share personal information collected in relation to particular funding projects with our delivery partners.. For example, we share personal information about the SHAKE Climate Change project with Rothamsted Research, our delivery partner.

We use suppliers to help us run the Foundation. For example, if you participate in the SGUKF matching programme, details about your donation or fundraising may be shared with CAF (Charities Aid Foundation) Bank in order for them to process the charitable donations. Another example is with the Foundation's banking suppliers where trustee personal details may be shared to manage accounts. We make sure there are written agreements with our suppliers that require them to keep your personal information safe, and only use any personal information in line with our instructions.

As we are a registered charity, we are required to share certain information with the Charity Commission. For example, trustee personal details will be shared upon appointment and within required reporting such as annual accounts.

There are other circumstances where we may need to share your personal information, for example:

- (a) if we transfer the running of the Foundation (or any part or project of the Foundation) to another organisation;
- (b) with our professional advisors e.g. lawyers, where necessary to protect our or a third party's interests;
- (c) if we are under any legal or regulatory obligation to do so; and
- (d) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our or a third party's legal right.

10. HOW WE KEEP YOUR INFORMATION SAFE AND INTERNATIONAL DATA TRANSFERS

It's our job to keep your personal information safe and secure. We have security measures in place to protect your personal information, and we provide training to our staff about how to keep personal information safe.

We use SGUK's servers (which store all our information, including your personal information). These are all hosted in the UK and/ or the European Economic Area (EEA). However, we use suppliers that operate around the world. This means that it is possible that personal information we collect from you may be transferred to and stored in a location outside of the UK or the EEA.

Certain countries outside of the UK or the EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred outside the UK or EEA to a country which does not offer a similar level of protection to the UK or EEA, we

will take all reasonable steps necessary to ensure that the recipient appropriately protects your personal information by, for instance, entering into contracts that have been approved by EU authorities. If you have any questions about data transfers, please do get in touch, using any of the options set out in section 1.

11. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

We keep your personal information for as long as we reasonably need to use it for the reasons we set out in section 7. We will carefully and regularly consider what information we need to retain and whether it is appropriate to delete any of your personal information. We may also retain personal information for longer periods where we are required to do so for legal or regulatory reasons, such as tax and accounting.

If you would like further information about this, please contact us using the details at section 1.

12. YOUR RIGHTS

When we use your personal information you have the right to:

- Ask for a **copy** of your personal information.

We may ask you for proof of your identity (for example, a copy of your passport). If we are satisfied with your identity, we will give you a copy of your personal information, unless an exemption applies. If you want to know more about how to request your personal information, the Information Commissioner's Office (or "ICO" for short) has useful guidance: <https://ico.org.uk/your-data-matters/your-right-of-access/>

- Ask that we **erase** the personal information we hold about you.

We may not be able to erase your personal information (for example, we may need to keep your personal information for a legal reason), but we will consider your request and let you know.

- Ask that we **correct** any personal information that we hold about you which you believe to be wrong.
- Ask that we **restrict** the use of your personal information if you believe that the information we hold is wrong, or that we don't have a valid reason for using your personal information.
- To change your mind and **withdraw** your consent where you have provided your consent for use of your personal information.
- Ask us to **stop** using your personal information, if we are using it for legitimate interests.

We may not need to stop, but we will need to show a good reason to continue to use your personal information.

There are other rights, which will not obviously apply to the way in which we are using your personal information. For example, the right to port (or transfer) your personal information to a third party in certain circumstances. Additionally, if we use automated decision making which

produces legal effects or similarly significantly affects you, we must tell you. If you want to learn more about the rights discussed above or your other rights, the ICO has useful guidance on these rights and when they apply, please [click here](#).

If you wish to exercise your rights, please contact us using the details in section 1.

If you have any concerns about the way we are handling your personal information, or if you've asked a question or raised a complaint that we haven't dealt with, you can contact the ICO directly:

Website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

13. UPDATES TO THIS NOTICE

We may update this notice. If we update this notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention where reasonably possible. Otherwise, you can access the latest version of this notice on our website.

