

MONEY FOUNDATION

VMF Privacy Notice

Privacy Notice – How Virgin Money Foundation holds and uses your information

This notice explains how your information may be held and used by Virgin Money Foundation:

1. [What information we'll hold about you](#)
2. [Where we collect information from](#)
3. [Why we need the information and what we use it for](#)
4. [Who we share information with](#)
5. [How long we hold information](#)
6. [Your legal rights in relation to your information](#)
7. [How we use cookies](#)
8. [How we use third party websites](#)
9. [Contacting us for further Information](#)
10. [Making changes to this information](#)

1. What information we'll hold about you

If you apply to, or refer an organisation to the Virgin Money Foundation for support we will be collecting your personal information and details of the person that will be the point of contact for the application. Prior to providing the personal information of another individual to the Virgin Money Foundation you need to obtain the approval of that individual.

By "information" we mean all the personal and financial information that you provide to us, that we collect, use, share and store. It can include but isn't limited to:

- Information about you and your contact details (e.g., your name, date of birth, home address, phone number, email address, company name and job title).
- How you access and use our website or other digital services (e.g., your IP address, your location and the device and software being used).

Sometimes where we ask for your information needed to enter into a contract with you or to meet a legal obligation (such as a credit check), we'll not be able to provide some products or services without that information.

2. Where we collect information from

We collect information directly from you and others.

You may give us information in:

- Applications, emails, letters, phone calls and conversations
- Using our websites or applications, including through cookies that collect information on your internet use

We also get information to perform identity checks (strictly no credit checks are performed) from:

- Credit Reference Agencies (e.g., Transunion)

We might also obtain information about you or the organisation you represent from other public sources.

3. Why we need the information and what we use it for

Data Protection law requires us to have one or more of the following reasons for using your information:

1. **'Contract performance'** – the information needed to provide, monitor and administer any grant.
2. **'Legal obligation'** – we are required by law to process your information, e.g., to verify your identity.
3. **'Legitimate interest'** – we're allowed to use your information where, on balance, the benefits of us doing so are legitimate and not outweighed by your interests or legal rights e.g., for our own management analysis and reporting purposes.
4. **'Consent'** – in some cases we may obtain your consent to use information in a particular way or where the law requires consent to be obtained e.g., sending you news and updates on foundation activities. Whenever 'consent' is the only reason for using your information, you have the right to change your mind and withdraw your consent.

Using your information

These are the main ways we'll use your personal information (and the reasons for doing so):

To assess and process applications (Contract Performance; Legal obligation)
We check that you meet the criteria to receive the grant you've applied for.

To verify the identity of individuals associated with applications (Contract performance; Legal obligation)

To verify your identity we'll check your details with credit reference agencies and publicly available information. This is an identity check only and won't impact your credit score. It leaves a soft footprint which is only visible to yourself and not other lenders if they were to look at your credit file.

To prevent fraud and money laundering (Legal obligation; legitimate interest)

The law requires us to take steps to combat the threats posed to our society by terrorism and money-laundering and other financial crime. We also have a legitimate interest in avoiding losses caused by financial crime such as fraud.

This may include collecting information that the law regards as being in a special category because of its sensitivity to you (including, racial or ethnic origin, religious or philosophical beliefs, trade union membership) and/or information about criminal convictions and offences. We will only use this kind of information where the processing is in the public interest and for the following purposes:

- Prevention or detection unlawful acts;
- Protecting the public against dishonesty;
- Regulatory requirements;
- Preventing fraud; and/or
- Suspicion of terrorist financing or money laundering.

To manage our business (Legitimate Interest)

We have a legitimate interest in organising and running our business in a correct and commercially sensible way and to comply with our legal and regulatory responsibilities.

For audit purposes, research and statistical analysis (Legal obligation; Legitimate interest)

We may use your information to undertake statistical analysis, system testing and research, with the aim of improving our services. We may also report to and communicate with our regulators, auditors and governmental agencies.

To keep in touch with you about your application and/or the management of the grant (Contract Performance)

We'll use your information to keep you updated about your application and the management of the grant. We will also use your information to monitor and assist us with the ongoing administration of grants awarded.

Provide updates relating to the Virgin Money Foundation (Legitimate Interest; Consent)

We have a legitimate interest in notifying you of new funding streams that are available. You have a legal right to tell us at any time that you don't want us to use the information we hold in this way or to withdraw any consent that you have given to us.

4. Who we share information with

When using the information we hold we may share it with other people or organisations.

We'll treat the information we hold as confidential and will only share information with the following organisations who are required to keep the information confidential, safe and secure:

- Other people who help us provide services to you. Examples include Content management Providers (CRM) co-funders, evaluators, designers as well as general service companies such as printers, and mailing houses.
- The personal information you and other individuals supply, as well as information already held, may be used by the companies within our group, including our parent company, Clydesdale Bank PLC (a trading name of Virgin Money), who provide administrative support. Full details of the companies within our group can be found at our website virginmoney.com/privacy.

We may also share information we hold with the following types of organisation:

- Credit reference agencies (CRA's).
- Fraud prevention agencies.
- Charities Commission.
- UK and overseas law enforcement agencies (e.g. the National Crime Agency).

For further information on how CRA's use your information go to www.transunion.co.uk/crain

5. How long we hold information

We'll retain information for no longer than is necessary to manage your relationship with us and this will mean that we'll continue to hold some information for a period after our relationship has ended. This is to comply with our legal and regulatory obligations to keep records of our relationship, to resolve disputes or where it may be needed for future legal proceedings.

6. Your legal rights in relation to your information

The law guarantees you rights in relation to your personal information. We have set out details of your rights below under individual headings.

Access to information

You always have the right to ask whether we hold information about you. And if we do, what the information is, why we're holding it and the ways it's being used. You're also entitled to a copy of the information.

Rectification of information

We always want the information we hold to be up to date and accurate. If any of the information we hold is either incorrect or out of date, then please tell us and we'll fix it.

Erasure of information

You have the right to ask us to erase or delete information where you consider there is no longer any justification for us holding it, either because:

- The information is no longer needed for the reason we collected it.
- We held and used the information based only on your consent, which you have now withdrawn.
- You have previously objected to a way in which we use information.
- We have been using the information unlawfully.
- There is a legal obligation on us to erase the information.

When you make a request for information to be erased, we'll have up to one month to respond. If we reject your request, we will tell you and set out the reasons why we'll not erase or delete the information.

Objecting to us using your information

We have told you about the ways in which we use the information we hold.

Where we have told you that any use of information is based on 'legitimate interest', you can raise an objection to that use. When you make an objection, we'll have up to one month to respond to you. We will stop using the information in this way unless we disagree that we should because of a compelling legal justification for continuing to use it. We'll always tell you what the justification is.

Remember, you can always simply opt out of receiving marketing communications at any time. You can do this by contacting us in the usual way.

Restricting some uses of information

In certain circumstances you have a right to block or limit the use of information by us. This may arise where:

- You have challenged the accuracy of the information we hold, and we are verifying this.
- You have objected to a use of information (see above) and we are considering whether your objection is valid.
- We have been using your information unlawfully, but you want us to continue to hold the information rather than erase it.
- We no longer need to keep the information, but you have asked us to hold it because of legal claims you're involved in.

7. Your online activities

Our website uses web cookies to give you the best experience and keep things secure. Some are essential and can't be turned off. Others are used for measuring and testing performance and improving functionality. We recommend you accept all cookies, or you can choose your own settings. Read more in our [Cookie Notice](#).

8. How we use third party websites

Our websites may contain links to sites operated by persons outside the Virgin Money Foundation. This privacy policy does not apply to those websites. We are not responsible for the privacy practices, content, or the products and services provided through those sites. We do not accept any responsibility for any such third-party websites, including without limitation for their accuracy, security, the products, or services which they offer or for any information which is collected through them. You are responsible for reviewing and abiding by the privacy policies and website terms and conditions of such third-party websites.

9. Contacting us for further Information

You can contact us at any time and in the normal way to discuss how Virgin Money Foundation holds and uses your information and your rights.

You can write to us at Virgin Money Foundation, Jubilee House, Gosforth, Newcastle upon Tyne, NE3 4PL.

You can also contact our Data Protection Officer by email at DPO@virginmoney.com or write to Group Data Protection Officer, Group Risk, Virgin Money, Sunderland, SR43 4JB.

If for whatever reason you are unhappy with any way we are using your personal information you should contact us in the first instance so that we can understand your issue and try and resolve it. If we can't resolve the issue, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. For further information visit ico.org.uk

If you have any further questions, please contact us at:

Phone: 0330 123 3624

Email: info@virginmoneyfoundation.org.uk

10. Making changes to this information

We'll keep this information up to date and it will always be available here or on request at any time.