



Charitable
Trust

Privacy Notice

Man Charitable Trust

25 May 2018



At the Man Charitable Trust, we respect your privacy and we are committed to protecting and safeguarding your Personal Data. We have developed policies and processes which are designed to provide for the security and integrity of your Personal Data. We are committed to Processing your Personal Data fairly and lawfully, and being open and transparent about such Processing.

1. Purpose of this Privacy Notice

This Privacy Notice explains how the Man Charitable Trust (the “Trust”, “we”, “us” or “our”) Processes Personal Data about individuals outside the Trust with whom we interact, including but not limited to our supporters; donors; attendees at our events; and charities and organisations we support (together, “you”). For such purposes the Trust is a Controller.

Capitalised terms used in this Privacy Notice are defined in Section 10.

This Privacy Notice may be updated from time to time. Please regularly check this page to review any updates we might make to reflect changes in our practices or changes in applicable law and regulation.

2. Processing your Personal Data

A. Collection of Personal Data

The Personal Data that we Process is collected or created from a variety of sources as follows:

<p>When you provide us with your Personal Data</p>	<p>For example, you may do this when you apply to us for grants, contact us via email, phone or by any other means.</p>
<p>When we create Personal Data in the ordinary course of managing and administering our partnership with you</p>	<p>For example, we may create records of our interactions with you and details of your time spent volunteering with us or details of any funding we have provided to you or your organisation which may constitute Personal Data.</p>
<p>When we receive your Personal Data from third parties</p>	<p>This could, for example be from your employer or relevant legal and regulatory authorities.</p> <p>This might also include information obtained for the purposes of vetting procedures where you have chosen to volunteer with us which will include background reference checks, criminal checks (see <i>Criminal Offences Data</i> in Section 2() below) or other due diligence procedures.</p> <p>Such checks may be performed on you if required by the nature of the opportunity you are applying to volunteer for.</p>

B. Types of Personal Data

In order to carry out the Processing activities set out in the table at Section 2(E) below, and where relevant to our relationship, the types of Personal Data that we Process include:

Personal Data Type	Examples
Identity Data	Your name (and in some cases proof of your name), username or similar identifier, marital status, title, date of birth or age, gender, signature and other similar information
Personal and business contact details	Your work or home address (and in some cases proof of address), phone, email, social media profile details and other similar information
Family, life cycle and social circumstances	The name and contact details of next of kin, family members, emergency contact details, outside business interests, hobbies, lifestyle choices, dietary preferences and other similar information
Communications data	Copies of communications with you, including copies of electronic communications made on our systems and other similar information.
Photos and CCTV images	Photographs that you provide or we obtain from publicly available sources, CCTV images from our office locations and other similar information

C. Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is necessary for compliance with a legal or regulatory obligation (including anti-money laundering processes, counter-terrorist financing procedures, sanctions checks, politically exposed persons checks and, where relevant, political contribution checks which may include information about your political opinions or criminal offence data);
- the Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law or regulation;
- you have made such Sensitive Personal Data public;
- the Processing is necessary for the establishment, exercise or defence of legal rights;
- the Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law and regulation that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests; and
- we have in accordance with applicable law and regulation, obtained your explicit consent prior to Processing your Sensitive Personal Data (it should be noted that this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

D. Criminal Offences Data

We will only Process Criminal Offences Data to the extent required or permitted by applicable law or regulation.

E. Purposes for which we may Process Personal Data

We will only Process your Personal Data when the law allows us to. Most commonly, we will Process your Personal Data where it is necessary for our legitimate interests and your fundamental rights do not override these interests. This means that we Process your Personal Data for purposes such as:

- to communicate volunteering or funding opportunities to you;
- to manage our relationship with you efficiently; and
- allow us to effectively and efficiently manage and administer the operation of the Trust.

Other common circumstances where we use your Personal Data are:

- Where we need to perform our obligations under the contract we have entered into with you.
- Where we need to comply with a legal or regulatory obligation.

On rare occasions, we may also use your Personal Data in the following situations:

- Where we need to protect your vital interests (or someone else's interests).
- Where it is needed in the public interest.

There may be other occasions where we ask you for your consent for the Processing of your Personal Data, on such occasions we will only use your Personal Data for the purposes which we will explain at that time.

More specifically, we may Process your Personal Data in the following situations (please note that not all Processes will be relevant to you and your relationship with the Trust and some of these purposes may overlap):

Communicating volunteering or funding opportunities to you	<ul style="list-style-type: none">• To provide you with information concerning volunteering opportunities, funding opportunities, events and other related information.
New charity partnerships	<ul style="list-style-type: none">• To process new grant applications and to comply with our trust deed.
Relationship management	<ul style="list-style-type: none">• To enable us to efficiently manage our relationship with you or your business;• to keep our records up to date;• to maintain records of services provided and our interactions with you; and• to respond to any complaints we may receive from you and to seek to resolve these.

Manage our relationships with grant partners	<ul style="list-style-type: none"> To enable us to manage how we work with other charities.
Administration and management of the Trust	<ul style="list-style-type: none"> To run the Trust in an efficient and proper manner; to comply with our trust deed; and to manage our finances, planning and communications.
Legal and regulatory compliance	<ul style="list-style-type: none"> To comply with our legal and regulatory obligations.
Fraud prevention	<ul style="list-style-type: none"> To detect, prevent and investigate fraud or potential fraudulent activity.
Legal proceedings	<ul style="list-style-type: none"> To establish, exercise or defend our legal rights.
Security	<ul style="list-style-type: none"> To provide for physical security of our premises and staff (including records of visits to our premises and CCTV recordings).

Should you require any further information in relation to the purpose for which we Process your Personal Data or our legal basis for doing so, please contact us using the contact details at Section 8 below.

3. Disclosure of Personal Data to third parties

We share your Personal Data with the Trust's Trustees and other Trust staff for the purposes described above, such as providing funding and information to you.

In addition, we may disclose your Personal Data in accordance with applicable law and regulation to:

- Governmental, legal, regulatory, tax or similar authorities, ombudsmen, central and/or local government agencies; and/or law enforcement officials (if mandated by law and regulation or if required for the protection of our legitimate interests);
- anti-fraud services in relation to data on known or suspected fraudulent activity;
- entities within the Man Group;
- our volunteers;
- the charities which we support and have a partnership with;
- third party service providers who provide us and our volunteers with volunteering activities;
- third parties to whom you request us to send your Personal Data;
- third party Processors (such as payment services providers and banks);

- our professional advisers (such as our auditors, accountants, financial advisers and lawyers);
- any relevant party, claimant, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law and regulation; and
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law and regulation.

We do not share your Personal Data with others for marketing purposes unless you agree to this.

4. Data Retention

How long we hold your Personal Data will vary. The retention period will be determined by various criteria, including the purposes for which we are Processing your Personal Data (as it will need to be kept for as long as is necessary for such purpose), legal and regulatory obligations (which may set a minimum period for which we have to keep your Personal Data) and our internal policies, which take into consideration the purpose for which we hold the Personal Data.

5. Security of your Personal Data

We have extensive controls in place to maintain the security of our information and information systems. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised staff. We operate layers of safeguards and defences designed to ensure that Man is able to operate safely. Amongst other things, such controls are designed to detect, respond and recover in case of any adverse events that may arise.

6. Your rights

You have a number of legal rights in relation to the Personal Data that is held about you by us, including:

- You have a right to obtain certain information regarding the Processing of the Personal Data and to access your Personal Data.
- If your Personal Data is inaccurate or incomplete, you have the right to request corrections to it.
- In certain circumstances, you have the right to receive some Personal Data in a structured, commonly used and machine-readable format.
- You have the right to ask us to transfer some of your Personal Data to other organisations, where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to us.
- You have a right to ask us to erase or “restrict” your Personal Data in some circumstances. Please note that there may be circumstances where you ask Man to erase your Personal Data but we are nevertheless legally entitled to retain it.

- Where we Process your Personal Data because the Processing is in our, or a third party's legitimate interests, then you may object to this Processing. Please note that there may be circumstances where you object to, or ask Man to restrict its Processing of your Personal Data but we are legally entitled to continue Processing your Personal Data or to refuse that request.
- In the limited circumstances in which we have asked for your consent to Process your Personal Data for a specific purpose, you may withdraw your consent at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

These rights may be limited, for example, if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law and regulation to keep or have compelling legitimate interests in keeping.

You also have a right to complain to a supervisory authority for data protection. This may either be the supervisory authority in the place of your habitual residence, your place of work, or the place where you consider that there has been a breach of data protection law.

To exercise any of these rights, please use the contact details provided in Section 8.

7. Your duties

Where our business relationship is with a corporate entity, we will Process Personal Data about such entity's directors, officers, employees and ultimate beneficial owners.

If you have received this Privacy Notice on behalf of such a corporate entity, you must inform your directors, officers, employees and ultimate beneficial owners (as appropriate) that Man Processes their Personal Data as well as the purpose for which we Process it.

8. Contact Details

For electronic communications, please contact:

Contact	Issue
Privacy@man.com	If you have any questions, concerns or wish to exercise your rights set out in Section 6.
DPincident@man.com	If you believe there is a potential data protection breach and wish to inform us of such breach.
Charitable.Trust@man.com	If your Personal Data changes, please let us know and we will correct, update or remove your details.

All written communications should be directed to:

Man Group
Data Protection
 Riverbank House
 2 Swan Lane
 London EC4R 3AD
 United Kingdom

9. EEA and Guernsey Data Regulators

You can find out more information about your rights by contacting an EEA data regulator such as the UK's Information Commissioner's Office (website at <https://ico.org.uk>) or the Guernsey Office of the Data Protection Commissioner (website at <https://dataci.gg>).

10. Defined Terms

Term	Definition
Controller	The entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
Criminal Offences Data	Information about criminal convictions and offences (actual or alleged), including reports from the Disclosures and Barring Service and other similar information.
Man Group	(i) Man Group plc; (ii) any company or other entity which directly or indirectly controls, is controlled by or is under common control with Man Group plc (including any holding company or subsidiary, each within the meaning of section 1159 of the Companies Act 2006); and (iii) any limited partnership or limited liability partnership whose general partner or managing member is an entity in (ii) above, but excluding any investment fund in relation to which Man Group plc or an entity or partnership in (ii) or (iii) above provides investment management, advisory, marketing or related services.
Personal Data	Information that is about any individual, or from which any individual is identifiable.
Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

	dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
Sensitive Personal Data	Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life or orientation, genetic or biometric or any other information that may be deemed to be sensitive under applicable law.