

# WCVA privacy notice: funding applicants and recipients

## INTRODUCTION

We treat privacy and confidentiality very seriously. We have developed this privacy notice to be as clear as possible about the personal information we collect and use.

We comply with all aspects of the UK's data protection law, which includes the European General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We manage a number of funding schemes both on our own behalf and on behalf of Welsh Government and other bodies ('the Funder/s') to support their policies and to contribute to our mission to be a catalyst for positive change by 'connecting, enabling and influencing' and in pursuit of our vision of 'a future where the third sector and volunteering thrive across Wales, improving wellbeing for all'.

Please ensure you read this notice carefully and contact us if you have any questions or concerns about our privacy practices.

## WHO ARE WE?

We are Wales Council for Voluntary Action WCVA, a Registered Charity (number 218093) and Company Limited by Guarantee (number 425299).

WCVA is registered as a Data Controller with the Information Commissioner's Office (ICO), registration number Z6141301.

At WCVA we have a Data Protection Officer who oversees our processing activities: that person is Emma Waldron, who can be contacted by email at [dpo@wcva.cymru](mailto:dpo@wcva.cymru) or by phone on 0300 111 0124.

## **WHO IS THE DATA CONTROLLER?**

The Funder is the Data Controller for all personal data required to help deliver the programme and their privacy notice in respect of this can be found here for WEFO funded projects: <https://gov.wales/docs/wefo/publications/180525-wefo-gdpr-en.pdf>

And here: <https://gov.wales/privacy-notice-welsh-government-grants> for Welsh Government grants

A Data Controller determines the purposes and means of processing data. We ask you to provide information that is required by us in order to process your application and in this respect WCVA is the Data Controller.

## **HOW WE COLLECT YOUR PERSONAL INFORMATION**

When your organisation applies for funding from any of the funding schemes we administer, and if funding is then awarded, we will collect personal information about you and your colleagues, trustees, directors and key personnel as part of the application process.

## **WHAT CATEGORIES OF PERSONAL DATA WILL WE COLLECT AND USE?**

- Your name
- Your contact details (including address, telephone number, e-mail address)
- Your previous experience in relation to the proposed project
- Your date of birth (when applying for loan funding)
- Your role within your organisation and/or funded project and any other personal information you provide to us.

## **THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

The legal basis for processing your personal data is 'processing is necessary for the purposes of the legitimate interest pursued by the controller', Article 6(1)(f) of the GDPR. The legitimate interests are those of WCVA to assess your eligibility for funding and to communicate with you for the administration of that funding, if you are successful.

## **WHY WE COLLECT AND USE YOUR PERSONAL INFORMATION**

We hold your contact details because you have indicated an interest in applying for funding from WCVA. We may use these to communicate with you about your status in relation to our Approved Beneficiary List, about a specific funding application that you have submitted or about the delivery of your project once an award has been granted. We may also contact you from time to time about upcoming funding rounds or with information about events and training that are specific to the fund/s you have applied to.

This may be done via our online application and project management platforms or via email.

We will use WCVA's Multipurpose Application Portal (MAP) for online applications and Word-based forms where not using the portal.

Prior to January 2020 we used eTenderWales for online applications: its privacy notice may be found at <https://www.jaggaer.com/service-privacy-policy/>

We will use our own Project Data System (PDS) to manage projects.

We will use your information for administration, audit and monitoring of the funds and will only disclose your information to our funders or delivery partners for the purposes of research, verification and evaluation or to provide support with the application process.

Before we provide funding to your organisation, we may undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you, which we may share with third party fraud prevention agencies. **If we intend to use the services of a third party fraud prevention agency, we will obtain your explicit consent first.**

If we collect personal data about project participants in order to provide evidence of eligibility directly to funders, this is covered by a separate notice, which may be found [here](#).

## **WHO ELSE WILL RECEIVE YOUR DATA?**

Other stakeholders, depending on the funding scheme: these may include Ipswich Software Limited (responsible for the development and maintenance of MAP and PDS), Bravo Solution if your application was submitted via eTenderWales prior to January 2020, Welsh Government, WEFO (Welsh European Funding Office), Wales Audit Office, Social Business Wales, European Commission, European Commission auditors, or evaluators and Third Sector Support Wales partners (county voluntary councils)

## **WILL YOUR DATA BE TRANSFERRED TO A RECIPIENT OUTSIDE THE EUROPEAN ECONOMIC AREA?**

No, WCVA will not transfer your data to a recipient outside the European Economic Area.

## **HOW LONG WILL WE KEEP YOUR DATA?**

If you have applied for funding provided through the Structural Funds Programmes in Wales, your data will be kept on secure servers until 31 December 2026, or later if we are

advised by WEFO that this is required for the purposes of managing or auditing the programmes.

However, if your organisation has been awarded funding under General Block Exemption or De Minimis, your personal data will be kept for 10 years from the conclusion of any aid award.

For other funding schemes, we will keep your personal data until, at the latest, six complete financial years after your funded project has been closed, is free from all conditions relating to the funding awarded and all payments have been made.

If you are an unsuccessful applicant to a fund that is not provided through the Structural Funds Programmes in Wales, we will destroy your personal data no later than one complete financial year after the funding scheme has closed.

We are strongly committed to information security and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us including the use of encryption and pseudonymisation.

## **WHAT RIGHTS DO YOU HAVE?**

You have a number of rights in relation to your personal data that we have. Not all the rights apply in all circumstances. If you wish to exercise any of the rights, please contact us in the ways detailed in the 'Who are we?' section:

- You have a right of access to the personal information we hold about you.
- You have the right to ask us to correct any information we hold about you that you think is wrong or incomplete.
- You have the right to object to any processing of your personal information where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop. There may, however, be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- You have the right to object if we process your personal data for the purposes of direct marketing. If you no longer want to receive communications from us, please contact us. We will stop sending you communications but will continue to keep a record of you and your request not to hear from us. If we deleted all of your information from our direct marketing databases, we would have no record of the fact that you have asked us not

to communicate with you and it is possible that you may start receiving communications from us at some point in the future, if we obtain your details from a different source.

- You have the right to ask us to delete your information. This is also known as the right to be forgotten or to erasure. We will not always agree to do this in every case, as there may be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- Where our processing of your personal information is based on your consent, you have the right to withdraw it at any time. Please contact us if you want to do so.
- You may have a right to obtain the personal information that you have given us in a format that be easily re-used and to ask us to pass this personal information on in the same format to other organisations. Please contact us to find out if this right applies to you.

## **WHO SHOULD YOU COMPLAIN TO?**

In the first instance, this should be to WCVA's Data Protection Officer as outlined under 'Who are we?', but you do have a right to lodge a complaint with the Data Protection Regulator, the Information Commissioner's Office (ICO) and they can be contacted on 0303 123 1113 or by email: <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office: Wycliff House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## **CHANGES TO THIS PRIVACY NOTICE**

This privacy notice was last updated on 11 August 2020. We keep this privacy notice under regular review and may change it from time to time by updating this page to reflect changes in the law and/or our privacy practices. We would encourage you to check this privacy notice for any changes on a regular basis.

