



SANJAY MORTIMER FOUNDATION (SMF)

PRIVACY POLICY

1. INTRODUCTION

This privacy policy (**Policy**) relates to your personal information in connection with your use of and access to the Sanjay Mortimer Foundation website (<https://www.sanjaymortimerfoundation.org>) (the **SMF Platform**) and any services or support provided by the Sanjay Mortimer Foundation (the SMF Platform and services together forming the **SMF Services**).

We are committed to protecting your information and your right to privacy. If you have any questions or concerns about our Policy, or our practices with regards to your personal information, please contact us via info@sanjaymortimerfoundation.org or by writing to us at The SMF, U35a Monument Business Park, Chalgrove, Oxford, OX44 7RW.

When you use the SMF Services, you trust us with your information, and we take your privacy very seriously. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue your use of the SMF Services.

2. CHANGES TO THIS POLICY OR YOUR PERSONAL INFORMATION

We review this Policy regularly and it is your responsibility to check regularly and determine whether you still agree to comply with the Policy. If you do not agree to any changes to this Policy, then you must immediately stop using the SMF Services. In the event we make any significant changes to this Policy we will use our reasonable endeavours to inform you of such changes in advance in writing.

It is important that the personal information we hold about you is true, complete, accurate and current. Accordingly, you must notify us of any changes to your personal information (for example, if you change your email address).

3. ABOUT US

The SMF Services are owned and operated by the Sanjay Mortimer Foundation (**SMF**), a company registered in England and Wales with company number 14055256 and whose registered office is situated at 82 Wandsworth Bridge Road, London, United Kingdom, SW6 2TF (**SMF/we/us/our**). The SMF is also a registered charity in England and Wales with charity no. 1205708. The SMF is the controller (also known as a data controller) of, and is responsible for, your personal information. The term "you" refers to the user wishing to access and/or use the SMF Services.

The SMF Platform provides a platform for you to apply to our non-profit initiative which aims to find and assist those with neurodivergent minds to realise their potential through the field of engineering.

4. INFORMATION WE MAY COLLECT ABOUT YOU

4.1 Personal information you disclose to us

In Short: We collect personal information that you provide to us including information such as your name, the name of your organisation, address, contact information, date of birth, job title, qualifications, social media handles/URLs, insurance information, organisation policies and certificates, beneficiaries contact details, guardian contact details, personal statements and medical information & certification.

(a) Where and how we collect personal information

We collect personal information that you voluntarily provide to us when applying to the SMF and actually using the SMF Services, or otherwise contacting us.

If you apply or are put forward for a role with us, or work for us (either directly or indirectly) for any period of time, we also collect your personal information, which may include your contact details, financial and payment details, details of your education, qualifications and skills, your marital status, your nationality, your NI number, your job title and your CV.

If you give us information on behalf of another individual, for example when putting that individual forward as your emergency/alternate contact or referee or next of kin, or by acting as that individual's emergency/alternate contact, referee or next of kin, in providing that information to us you are confirming that you have sought and obtained, from that individual, permission for you to:

- Consent on their behalf to the processing of their personal data;
- Receive on their behalf any data protection notices;

and you shall indemnify us and hold us harmless against any claims, actions, proceedings, losses, damages, costs (including reasonable legal costs) and expenses (including taxation), in each case of any nature whatsoever, arising out of or in connection with your failure to obtain these permissions.

More particularly, the personal information that we collect depends on the context of your interactions with us, the choices you make and the products and features you use. For example:

- We gather information directly from you face to face if you come to our offices for information or to discuss an agreement over the telephone if you ring us to make an enquiry.
- We collect personal information via our website, application form, mobile applications and other technical systems.
- We collect personal information when you use our website or mobile applications to sign up to, participate in or receive a service from us, for example where you contact us, request information online, report an issue, provide feedback or enter a live chat.
- Our website also uses cookies and collects IP addresses.
- We may monitor and record communications with you (such as telephone conversations and emails). We may do this for a number of reasons, such as to check the quality of our customer service, for training purposes, to prevent fraud or to make sure we are complying with legal requirements.
- If you visit our offices, some personal data may also be collected from monitoring devices and systems such as closed-circuit TV (CCTV).

(b) The types of personal information we may collect

When you use the SMF Services and/or when you otherwise deal with us, we may collect the following information about you (the **Information**):

- **Identity Data**, which includes your first name, last name and gender.
- **Contact Data**, which means the data we use to contact you including your billing address, delivery address, email address and contact number.
- **Financial Data**, which means the payment method and card association used to process any payments made by you to us (for services, merchandise or where you donate, for example) or where we make payments to you upon a successful application for a grant. We do not store or process your card details ourselves, they are processed and stored via one of our contracted third-party service providers. We encrypt your payment card details in your browser and securely transfer this data to our relevant third-party payment provider to process a payment.

- **Transaction Data**, which means details about transactions you have made in connection with the SMF Services, including the payments to and from you along with other details of services you have purchased from us or donations which you have made to us.
- **Profile Data**, which includes your username, email address and log-in data, details of any purchases or donations made by you, and your interests, preferences, feedback and survey or questionnaire responses and details of your next of kin, emergency/alternate contact(s) or referee(s) (note: you can delete or replace your next of kin, emergency/alternate contact(s) or referee(s) at any time by contacting us).
- **Usage Data**, which includes Information about how you use the SMF Services. This includes your browsing patterns and Information such as how long you might spend on one of our webpages on the SMF Platform and what you look at and for, the page that referred you to the SMF Platform and the click stream during your visit to our website, page response times, and page interaction Information (for example, clicks you make on a page).
- **Marketing and Communications Data**, which includes your preferences with regards to receiving marketing from us and your other communication preferences.
- **Other Information relevant to services, customer surveys, questionnaires and/or offers.**

4.2 Sensitive personal information

In Short: We collect sensitive personal data due to the nature of the services we provide.

Due to the nature of the services we provide, beneficiaries of the SMF Support will be asked to provide sensitive personal information relating to their physical or mental health or condition. We will only collect your sensitive personal information with your explicit consent (the application process) and do so in order to confirm you meet the Charity's criteria for SMF Support – that the beneficiary has been diagnosed as being neurodivergent. We will ask what condition you have been diagnosed with and proof of that diagnosis.

4.3 Personal information from third parties

In Short: We may receive information about you from third parties, and we may use this information to provide, improve and personalise the SMF Services.

Occasionally we may receive information about you from other sources, which we will add to the information we already hold about you in order to help us provide, improve and personalise the SMF Services. If you apply for a job with us, we may also receive information from those who provide references relating to your prospective or actual engagement or employment.

4.4 Information automatically collected

In Short: Some Information – such as IP addresses and/or browser and device characteristics – is collected automatically when you use the SMF Platform.

We automatically collect certain Information when you visit, use, or navigate the SMF Platform. This Information does not reveal your specific identity (unless your device name is the same as your name) but may include device and usage Information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the SMF Platform and other technical Information. This Information is primarily needed to maintain the security and operation of the SMF Platform, and for our internal analytics and reporting purposes.

Like many businesses, we also collect Information through cookies and similar technologies.

How we use cookies

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

5. HOW DO WE USE YOUR INFORMATION?

In Short: We process your Information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use your Information collected via the SMF Services for a variety of business purposes described below. We process your Information for these purposes in reliance on our legitimate business interests (**Business Purposes**), in order to enter into or perform a contract with you (**Contractual Reasons**), with your consent (**Consent**), and/or for compliance with our legal obligations (**Legal Reasons**). We indicate the specific processing grounds we rely on next to each purpose listed below.

We may process your Information for the following purposes:

- To take steps towards entering into a contract with you, to provide the SMF Services and to claim any right to be paid under our SMF Terms and Conditions (Contractual Reasons) which can be views via our website. This includes collecting and using your personal information to:
 - Prepare an agreement with you;
 - Manage any accounts you hold with us;
 - Contact you for reasons related to the SMF Services;
 - Enable us to follow up on enquiries made by you in relation to the SMF Services and/or to provide information you have requested;
 - Contact your referee(s) or collaborator to obtain a reference for a job and/or the support that you are applying for;
 - Deal with payments of grants to you, donations from you and/or payment for services provided by SMF;
 - Notify you of any changes to our Site or to the SMF Services that may affect you; and
- To fulfil and manage payments in connection with the SMF Services (Contractual Reasons).
- To contact you regarding enquiries you have made in relation to the SMF Services.
- To send administrative Information to you for Business Purposes, Legal Reasons and/or possibly Contractual Reasons. We may use your Information to send you product, service and new feature

information and/or information about changes to our Terms and policies, as may be in place from time to time.

- To send you marketing and promotional communications for Business Purposes and/or with your Consent. We and/or our brand partners may use your Information for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails (see below for further details).
- To facilitate account creation and the log-in process with your Consent. If you choose to link your account with us to a third party account (such as your Google or Facebook account), we use the Information we are consequently allowed to collect from those third parties to facilitate account creation and the log-in process. See the section below headed "How Do We Handle Your Social Media Log-ins" for further information.
- To administer promotions for our Business Purposes and/or with your Consent.
- To request feedback for our Business Purposes and/or with your Consent. For example, we may use your Information to request feedback and to contact you about your use of the SMF Platform.
- To protect the SMF Services for Business Purposes and/or Legal Reasons. We may use your Information as part of our efforts to keep the SMF Services safe and secure (for example, for the purposes of monitoring and/or preventing fraud).
- To enforce our Terms and policies for Business Purposes, Legal Reasons and/or possibly Contractual Reasons.
- To respond to legal requests and prevent harm for Legal Reasons. For example, if we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- We may use your Information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve the SMF Services, our products and services, our marketing and your experience.

6. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share Information for Contractual Reasons, to fulfil our Business Purposes, or with your Consent.

We only share and disclose your Information in the following situations:

- **Contractual.** We may share Information with our partners to enable us to provide any grants or services to you.
- **Compliance with Legal Obligations.** We may disclose your Information where we are legally required to do so in order to comply with applicable laws, such as the Charities Commission, judicial proceedings, court orders, or legal processes, such as in response to a court order or a subpoena (including in response to requests from public authorities in order to meet national security or law enforcement requirements).
- **Vital Interests.** We may disclose your Information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, illegal activities or situations involving potential threats to the safety of any person, or where we believe it is necessary for the purpose of providing evidence in connection with litigation proceedings in which we are involved.

- **Third Party Service Providers.** We may share your Information with third party vendors, service providers, credit reference agencies, trade associations of which we are a member, credit card associations, contractors or agents who perform services and require access to such Information to carry out that work. Examples include: third party software developers Such third parties will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential and may not use it other than as we ask them to and always in accordance with this Policy.
- **Business Transfers.** We may share or transfer your Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third Party Advertisers.** We may use third party advertising companies to serve ads when you visit the SMF Platform. These companies may use Information about your visits to the SMF Platform and other websites that are contained in web cookies and other tracking technologies in order to provide personalised advertisements about goods and services that may be of interest to you. See 4.4 Cookie usage for further Information.
- **Business Partners.** Provided you have given us Consent to do so we may share your Information with our business partners to offer you certain products, services or promotions.
- **With your Consent.** We may disclose your Information for any other purpose with your Consent, including with any person who you have named as a person we can contact to discuss your account and any agent or representative of yours.

We may disclose aggregated, anonymous Information (i.e. Information from which you cannot be personally identified), or insights based on such anonymous Information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the SMF Services. In such circumstances we will not disclose any Information which can identify you personally.

7. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your Information in countries other than the UK, but will take all reasonable steps to ensure it is protected.

Whenever we transfer your Information outside of the UK, we will take all reasonably practicable measures to protect your Information in accordance with this Policy and applicable laws. To the extent that any transfer requires approved safeguards to be in place we will only transfer your Information to countries that have been deemed to provide an adequate level of protection for personal data. Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. Please contact us if you want further information on the specific mechanism(s) used by us when transferring your personal data out of the UK.

8. THIRD PARTY WEBSITES

In Short: We are not responsible for the safety of any Information that you share with third party providers who feature or advertise, but are not affiliated with, the SMF Services.

The SMF Platform may feature links to third party websites or social media channels or contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Policy.

We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the SMF Platform. You should review the policies of such third parties and contact them directly if you have any related questions.

9. FOR HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your Information for as long as necessary to fulfil the purposes outlined in this Policy, unless a longer retention period is permitted or required by law.

We will only keep your Information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax law, accounting requirements or other legal or regulatory requirements).

When we have no ongoing Business Purpose to justify the processing of your Information, we will either delete or anonymise it, or, if this is not possible (for example, because your Information has been stored in backup archives), then we will securely store your Information and isolate it from any further processing until deletion is possible.

10. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your Information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any Information we process. For example, we store your personal data on secure servers and within Microsoft cloud, offering robust access control, automated monitoring systems, in-transit data protection, network protection etc.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable supervisory body of a suspected data breach where we are legally required to do so.

However, please also remember that we cannot guarantee that the Internet itself is 100% secure. Although we will use our reasonable endeavours to protect your Information, we cannot guarantee the security or integrity of personal Information that is transferred from you or to you via the Internet. Transmission of personal Information to and from the SMF Platform is therefore at your own risk. You should only access our services within a secure environment.

11. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We take steps to ensure that the SMF Services are only used by those over 14 years of age, and we do not knowingly collect data from or market to children under 14 years of age.

Eligibility for beneficiaries is 14 – 25 years of age. We do not knowingly solicit data from or market to children under 14 years of age. By using the SMF Services, you represent that you are at least 14 years of age. If we learn that Information from users less than 14 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under 14 years of age, please contact us immediately via info@SanjayMortimerFoundation.org.

All applications must be backed-up with a 'Collaborator' or referee statement. For any applicant under the age of 18 years of age, approval from a parent or guardian is sought. The collaborator must sign our Terms (accessible via our website) which confirm the collaborator provides a regulated & safe environment for the beneficiary to learn.

12. HOW DO WE HANDLE YOUR SOCIAL MEDIA LOG-INS?

Summary: If you choose to register or log into our website using a social media account, we may have access to certain Information about you.

The SMF Platform may offer you the ability to register and log-in using your third-party social media account details (e.g. Facebook, Twitter etc). Where you choose to do this, we will receive certain Information from your social media provider. The Information we receive may vary depending on the social media provider concerned,

but will often include your name, e-mail address, friends list, profile picture and other Information that you choose to make public. If you log-in using Facebook, we may also request access to other information related to your account, such as friends, check-ins and likes, and you may choose to grant or deny us access to each individual permission.

The Information that you post, transmit, or otherwise make available on such social media platforms may be viewed and/or used by other users of those networks and we have no control over that viewing and use and cannot prevent further use of that Information by third parties.

If you choose to link your SMF profile to a social media account, Information that you provide to us in the process may be included on your SMF profile. Additionally, your contacts on the social media platform(s) (**Friends**) may be able to see your activity on the SMF Platform. A link to your public profile on the social media site may be added to your SMF profile and other members and users of the SMF Services may be able to see any Friends or links (e.g. friends of Friends) via the social network(s) that you have in common with them.

When you interact with us through social media networks, you acknowledge that we may access your Information that is held by that account, solely in accordance with your social media privacy settings. Any links to social media are not under our control and remain solely your responsibility. You acknowledge that any Information posted via social media through the SMF Platform, or via any third party which you allow to access your content, is posted entirely at your own risk and that by posting to a public platform you make that Information visible to third parties who can use that Information at their discretion.

Please note that we do not control, and are not responsible for, other uses of your Information by your third-party social media provider(s). We recommend that you review their privacy policies to understand how they collect, use and share your Information, and how you can set your privacy preferences on their sites and apps.

13. YOUR CONSENT TO PROCESSING

You will be required to give Consent to certain processing activities before we can process your Information. Where applicable, we will seek Consent from you when you first submit Information to or through the SMF Services.

If you have previously given your Consent, you may freely withdraw such Consent at any time. You can do this by emailing info@SanjayMortimerFoundation.org or, where applicable, clicking the 'Unsubscribe' button that appears in mailing list communications.

If you withdraw your Consent, and if we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another legal basis for processing your Information, then we may continue to do so subject to your legal rights.

Please note that if we need to process your Information in order for you to use the SMF Services and you object or do not provide Consent to us processing your Information, you accept that the SMF Services will no longer be available to you.

14. MARKETING AND OPTING OUT

If you have given Consent to marketing we may contact you about our products, services, promotions and special offers. If you no longer wish to receive such Information, you can withdraw your Consent at any time by sending an email to info@SanjayMortimerFoundation.org or unsubscribing from the communications.

If you have given Consent, we may share your Information with carefully selected third party organisations and business partners and they may contact you directly. If you would prefer to no longer receive direct marketing communications from third parties and partners after previously giving your Consent, please contact those third parties and partners directly to withdraw the Consent.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us in connection with your application.

15. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You have certain rights in respect of your Information.

You have certain rights in relation to the Information that we hold about you. Details of these rights and how to exercise them are set out below. Please note that we will require evidence of your identity before we are able to respond to any requests. This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further Information in relation to your request to speed up our response. To exercise or discuss any of your rights, please contact us via info@SanjayMortimerFoundation.org.

- **Right of Access.** You have the right at any time to ask us for a copy of the Information that we hold about you and to check that we are lawfully processing it. Where we have good reason, and where data protection law permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reason(s) for doing so.
- **Right of Correction or Completion.** If Information we hold about you is not accurate or is out of date and requires amendment or correction, you have a right to have the data rectified or completed.
- **Right of Erasure.** In certain circumstances, you have the right to request that the Information we hold about you is erased (for example, if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based only on your Consent and there are no other legal grounds on which we may process the Information).
- **Right to Object to or Restrict Processing.** In certain circumstances, you have the right to object to our processing of your Information (for example, if we are processing your Information on the basis of our legitimate interests but there are no longer any compelling legitimate grounds to justify our processing overriding your rights and interests).

You may also have the right to restrict our use of your Information, for example during a period in which we are verifying the accuracy of your Information in circumstances where you have challenged the accuracy of that Information.

- **Right of Data Portability.** In certain instances, you have a right to receive the Information that we hold about you (or a portion thereof) in a structured, commonly used and machine-readable format.

In such circumstances, you can ask us to transmit your Information to you or directly to a third-party organisation on your behalf.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests that relate to personal Information of others without their consent.

If we are relying on Consent to process your Information, you have the right to withdraw your Consent at any time. Please note however that this will not affect the lawfulness of the processing that occurred before the withdrawal of such Consent.

16. CONTACT US

We welcome your feedback and questions on this Policy. If you wish to contact us about this Policy or have any other questions, please email us via info@SanjayMortimerFoundation.org.

You have the right to make a complaint at any time to the Information Commissioner's Office (the **ICO**), the UK supervisory authority for data protection issues (<https://ico.org.uk/concerns>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

17. REVIEW

Date of Review	Changes to sections...	Approved by Name	Approved by Role
1 st May 2024			