

**PETER COATES FOUNDATION
PCF PRIVACY POLICY**

Introduction

Peter Coates Foundation is a private limited company by guarantee and is registered in England and Wales under company registration number 13738665 and whose registered office is at 41 Eastgate Street, Stafford, Staffordshire, United Kingdom ST16 2LY (referred to as **PCF, we, us** or **our**).

We respect your privacy and are committed to protecting your personal data. This privacy policy (**Policy**) explains when and why we collect personal information about visitors to and/or users of our website www.petercoatesfoundation.org (**Website**), students or prospective students who make an online application for a PCF bursary through the Website (and, where relevant, details of their family members) and other people who contact or interact with us; how we use that personal information; the conditions under which we may disclose it to others and how we keep it secure.

This Policy together with the website terms of use and cookies policy, applies to your use of the Website.

This Policy provides information on the personal data we process in respect of the following categories of individuals:

- visitors to and/or users of the Website; and
- students or prospective students who have received an offer for the Peter Coates MSc in Entrepreneurship at Staffordshire University (**Course**) and who make an online application for a PCF bursary through the Website; and
- where relevant, family members (including partners and parents) of the students or prospective students referred to above.

You may wish to download a pdf version of this Policy. Please also use the [Glossary](#) to understand the meaning of some of the terms used in this Policy.

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1. WHAT IS THIS PRIVACY POLICY FOR?

This Policy aims to give you information on how we collect and process your personal data.

Neither the Website nor our PCF bursary awards are intended for use by children below the age of 18 years old and we do not knowingly collect data relating to children.

Please ensure that you read this Policy together with any other privacy policy or relevant policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy is intended to supplement other notices and privacy policies not to override them.

Our role

We are the controller and are responsible for your personal data. By this we mean that we determine the purposes for which and the manner in which your personal data is, or is to be, processed.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, our privacy practices or want to submit a request to exercise your [legal rights](#), please contact the data privacy manager using the details set out below.

Contact details

Name of data privacy manager: Kathryn Fox

Email address: data.protection@tpcf.org

Postal address: Peter Coates Foundation, 41 Eastgate Street, Stafford, Staffordshire, United Kingdom ST16 2LY

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

Data protection law requires PCF, as controller for your data:

- to process your data in a lawful, fair and transparent way;
- to only collect your data for explicit and legitimate purposes;

- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date;
- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about; and
- to ensure that appropriate security measures are used to protect your data.

Changes to this Policy and your duty to inform us of changes

We keep this Policy under regular review. This Policy was last updated in June 2022. Historic versions can be obtained by contacting us.

Any change to this Policy will be on this page and we will take reasonable steps to make you aware of any material changes.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime.

Third-party links on our Website

The Website may, from time to time, include links to third-party websites, plug-ins and applications (including, a link to the webpage on Staffordshire University's website which is specific to the Course, once this webpage has been launched). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. **When you leave the Website, we encourage you to read the privacy notice of every website you visit.**

2. WHAT DO WE COLLECT FROM YOU?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Category of Data	Information Collected
Identity Data	includes first name, middle name, last name, date of birth, gender, nationality and any data that you share with us to verify your identity.

Contact Data	includes residential address, email address and telephone number.
Financial Data	includes information that you provide to us in your PCF bursary application form relating to your financial situation (including details of your income and your partner's income and number of dependants).
Education and Employment Data	includes information that you provide to us in your PCF bursary application form relating to your educational background (including details of the type of qualification and grade achieved) and employment history (where applicable).
Technical Data	includes Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
Profile Data	includes your history, your interests, preferences and feedback and, where applicable, information that you tell us about yourself within your online application for a PCF bursary (such as interests and career aspirations).
Usage Data	includes details about how you use the Website including, but not limited to, traffic data and other communication data and the resources that you access.
Communications Data	includes your communication preferences.

We refer to the above categories of data below in the 'How we use your personal data' section.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose (for example, when evaluating the number of PCF bursary applications by gender). Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

We do not intend to collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

Nor do we collect any information about criminal convictions and offences. However, to the extent that you provide us with any Special Categories of Personal Data as part of your online application for a PCF bursary, we will ensure that we treat such data in accordance with data protection laws.

When you provide personal information to us which does not relate directly to you but is personal information of a third party (for example, the name and contact details of family members), you confirm that you are authorised to provide such information and shall ensure that this Policy is brought to the attention of such individuals so that those individuals understand how their personal data will be processed by us. We will hold and use such personal information in accordance with this Policy and data protection laws.

What happens if you do not provide personal data?

By law, we may be required to collect personal data, or under the terms of a contract we have with you, and if you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with access to the Website or to allow you to make an online application for a PCF bursary). In this case, we may have to cancel the contract we have with you but we will notify you if this is the case at the time.

3. How PCF COLLECTS YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

- **Information you give us.** This is information (including Identity, Contact, Financial, Education and Employment and Profile Data) you provide to us about you by filling in forms on the Website, making an online application for a PCF bursary or by corresponding with us (for example, by email).
- **Information we receive from other sources.** We may receive personal data about you from various third parties and public sources (for example, Technical Data and Usage Data from analytics providers and search information providers such as Google Inc., Identity and Contact Data from Staffordshire University and/or other publicly available sources).
- **Information we collect about you and your device.** Each time you use our Website we will automatically collect personal data (including Technical and Usage Data) from you. We collect this data using cookies and other similar technologies. Please see the paragraph below on Cookies for further details.
- **Cookies.** A cookie is a small data file that is stored on your computer following your visit to a certain website. Like most websites, PCF uses cookies on our Website to record information about your activities on our Website and to 'remember' you when you return to them to enable us to provide you with a better service. Some cookies will remain on your computer until you delete them, while others, like session ID cookies only last whilst your browser is open. Your browser may automatically accept cookies but you can change this in your settings to reject cookies and you will still be able to use our Website, but your ability to use certain aspects of our Website may be limited. We use cookies for several reasons, including but not limited to analyse usage patterns and analytics of our Website. For detailed information on the cookies we use, the

purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you;
- Where it is necessary for our **legitimate interests** (or those of a third-party) so long as your interests and fundamental rights do not override those interests;
- Where we are **required to by law**; and/or
- In an emergency, where this is necessary to protect your **vital interests** or someone else's vital interests.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent at any time by [contacting us](#).

Why we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Where you are a visitor to and/or user of the Website:

Purpose/activity	Type of Data	Lawful basis for processing
To manage our relationship with you which will include notifying you of changes to the Website and responding	(a) Identity (b) Contact (c) Profile (d) Communications (e) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to analyse how users use our Website and services)

to any queries which you may raise with us	(f) Technical	(c) Necessary to comply with a legal obligation
To administer and protect the objectives of the organisation and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to carry out the objectives of the organisation , provision of administration and IT services, network security and to prevent fraud)
To use data analytics to improve the Website, services and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users, to keep the Website updated and relevant and to develop our organisation)

Students or prospective students who have received an offer for the Course and who make an online application for a PCF bursary:

Purpose/activity	Type of Data	Lawful basis for processing
To inform you of the process to be undertaken in respect of your online application for a PCF bursary	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the purposes of carrying out the objectives of the organisation)
To assess your eligibility for a PCF bursary	(a) Identity (b) Contact (c) Financial (d) Education and Employment (e) Profile (f) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the purposes of carrying out the objectives of the organisation)
To communicate with you in relation to your online application for a PCF bursary (including to notify you as to whether your application has been successful)	(a) Identity (b) Contact (c) Financial (d) Education and Employment (e) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the purposes of carrying out the objectives of the organisation)

	(f)Communications	
Where you have been awarded a PCF bursary, to communicate with you or about you where necessary to administer your PCF bursary, check your continuing enrolment on the Course and collect feedback	(a) Identity (b) Contact (c) Financial (d) Education and Employment (e) Profile (f)Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for the purposes of carrying out the objectives of the organisation)
Where you have been awarded a PCF bursary, to contact you following completion of the Course to: (i) arrange for your attendance at a formal review to assess the extent to which you are furthering the objectives of the organisation; and (ii) seek updates as to how the PCF bursary may have had an impact on or influenced your career and to publish success stories	(a) Identity (b) Contact (c) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to promote the objectives of the organisation and to give future students of the Course an insight into your experience)

Where relevant, family members (including partners and parents) of students or prospective students.

Purpose/activity	Type of Data	Lawful basis for processing
To assess the eligibility of the student or prospective student for a PCF bursary	(a) Identity (b) Contact	Necessary for our legitimate interests (for the purposes of carrying out the objectives of the organisation)

Marketing

We will not use or process your personal data for marketing purposes. If we wish to use your personal data in the future for marketing purposes, we will notify you and we will explain the legal basis which allows us to do so.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original

purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

Where you have been awarded a PCF bursary, we may share your personal data with Staffordshire University for the purposes of administering your PCF bursary (as described in section 4 above).

We may also share your personal data with the parties set out below for the purposes set out in the table in section 4 above. If any of these organisations are based, or have group or affiliated companies that are based, outside of the United Kingdom (**UK**), then section 6 below sets out the basis on which your personal data is transferred to them.

Third Party service-providers	Service
Professional advisers	Our professional advisers act as processors or joint controllers. This includes lawyers, bankers, auditors and insurers based within the UK who provide consultancy, banking, legal, insurance and accounting services. This also includes SORBUS, who manage day to day operations of the Peter Coates Foundation. SORBUS is located at 41 Eastgate St, Stafford, ST16 2LY (www.sorbus.com).
Service providers	Service providers acting as processors or sub-processors who provide IT and systems administration services and other service providers we use to help deliver our services to you. These service providers include DX3 webs who provide web hosting for the Website (dx3webs.com) and 848, who provide IT support services to SORBUS (as above) and who are located at Unit 3, Marconi Gate, Staffordshire Technical Park, Stafford ST18 0FZ (https://848.co).
Google Inc.	Google is a company incorporated and registered in the USA. We use Google Drive in connection with the storage of data. You can access Google's terms and conditions and privacy policy on its website.

Jotform Inc.	Jotform is a company incorporated and registered in the USA. We use online forms created by Jotform to collect data from you on the Website and via the application form for a PCF bursary. You can access Jotform's privacy policy on its website at https://www.jotform.com/privacy/ .

We may need to disclose your information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use; or to protect the rights, property or safety of our organisation or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

We will take all reasonable steps to ensure that third parties respect the security of your personal data and treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. WHEN PCF TRANSFERS DATA INTERNATIONALLY

Some of the third parties identified in section 5 above are based outside the UK, or have group or affiliated companies based outside of the UK, so their processing of your personal data may involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data 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 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 used by us when transferring your personal data out of the UK.

7. PCF SECURITY MEASURES

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

8. DATA PCF RETAINS

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In circumstances where you have been awarded a PCF bursary, we will retain your personal data during the period from your initial application until 12 months after completion of the Course. We may contact you following your completion of the Course for the purposes set out in section 4 of this Policy .

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In some circumstances, you can also ask us to delete your data, see [Your Legal Rights](#).

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are listed below, a summary of which is included in the [Glossary](#).

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*
- *Right to object to automatic profiling and monitoring.*

You also have the right to ask us not to continue to process your personal data for marketing purposes (where applicable).

You can exercise any of these rights at any time by contacting us at data.protection@tpcf.org.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Further information

You can obtain further information about data protection laws by visiting the Information Commissioner's Office website at www.ico.org.uk.

GLOSSARY

LAWFUL BASES

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about

how we assess our legitimate interests against any potential impact on you in respect of specific activities by *contacting us*.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes (where applicable). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.