

## **Privacy Notice**

### **AKO Foundation**

AKO Foundation (“**the Foundation**”, “**we**”, “**us**” and “**our**”) is a charity incorporated in England and Wales and its registered office is 61 Conduit Street, London, W1S 2GB. Its Registered Company number is 8385711 and its Registered Charity Number is 1151815.

#### **About this privacy notice**

This Privacy Notice explains in detail the types of personal data the Foundation may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe.

We hope the following information will answer any questions you have but, if not, please get in touch with us.

We are a data controller in respect of your personal data for the purposes of data protection law, such as the European Union’s General Data Protection Regulation. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies to you if (a) you are a recipient of grants from the Foundation or a service provider to us, (b) your personal data has been provided to us in connection with any of the foregoing by another person (such as where you are a director, partner, trustee or employee of such a person), or (c) you otherwise enter into communications with us by email or other means.

This privacy notice sets out the basis on which the personal data that you provide to us, that we create about you or that we obtain about you from other sources will be processed by us. Please take the time to read and understand this privacy notice.

#### **Personal data that we might use**

We might process the following personal data about you:

- (a) information provided to the Foundation by you or (if different) the recipient or applicant for a grant from the Foundation: this might include your name and address, contact details, signature, employer and job title. Such information might be provided as part of the grant process or at other times, and face-to-face, by telephone, by email or otherwise.
- (b) information that the Foundation collects or generates: this might include information relating to your (or an applicant’s) grant from the Foundation and emails (and related data).
- (c) information that the Foundation obtains from other sources: this might include information obtained from public bodies (such as the UK Charity Commission), public websites and other public sources.

#### **Uses of your personal data**

We collect your personal information to fulfil our contractual obligations, our statutory and regulatory obligations and/or for the legitimate interests of the Foundation and for other purposes for which the Foundation has a lawful basis under the privacy laws, including:

- (a) compliance with legal and regulatory obligations and charity standards.
- (b) general administration, including communicating with service providers and accountancy and audit services.
- (c) assessing and processing grants made by the Foundation.

- (d) other activities, such as decision-making in relation to the Foundation and its charitable activity.

We are entitled to process your personal data in these ways for the following reasons:

- (a) you may enter into a grant agreement with the Foundation and some processing will be necessary for the performance of that contract or will be done at your request prior to entering into that contract.
- (b) processing may be necessary to discharge a relevant legal or regulatory obligation.
- (c) the processing is necessary for the legitimate activities of the Foundation or another person, such as:
  - (i) carrying out the ordinary or reasonable activities of the Foundation or other persons, or other activities previously disclosed to you or referred to in this privacy notice.
  - (ii) ensuring compliance with all legal and regulatory obligations and standards applicable to charities, and preventing fraud.
  - (iii) ensuring the security of information systems.

### **Disclosure of your personal data to third parties**

We may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) professional advisers such as law firms and accountancy firms, and (b) other service providers of the Foundation including AKO Capital LLP and technology service providers. Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting us using the details set out under “Contacting us” below.

### **Transfers of your personal data outside the European Economic Area**

We do not anticipate that your personal data will be transferred to or stored by persons outside the European Economic Area. However where personal data is transferred outside the European Economic Area we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission or the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data.

### **Retention of personal data**

The length of time for which we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

## **Your rights**

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- (a) the right to obtain information regarding the processing of your personal data and to access the personal data that we hold about you.
- (b) in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.
- (c) the right to request that we rectify your personal data if it is inaccurate or incomplete.
- (d) the right to request that we erase your personal data in certain circumstances.
- (e) the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances.
- (f) the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out under “Contacting us” below. You can find out more information about your rights by contacting an EU data regulator such as the UK’s Information Commissioner’s Office or from its website at [ico.org.uk](https://ico.org.uk).

## **Contacting us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions and requests to [privacy@akofoundation.org](mailto:privacy@akofoundation.org).