

The Wilbur & Niso Smith Foundation Privacy Policy

The Wilbur & Niso Smith Foundation (the 'Foundation'/'we'/'us') is a Charitable Incorporated Organisation registered with the Charity Commission in England and Wales, number 1161513. Please read the following Privacy Policy that explains how we use and protect your information. We will be the 'data controller' of the information you provide to us.

Our Contact Details

Our registered and main trading address is Unit 9, 5-7 Wells Terrace, London N4 3JU.

For data protection queries, please contact us by email at team@wilbur-niso-smithfoundation.org or by post at: Unit 9, 5-7 Wells Terrace, London N4 3JU.

This Privacy Policy was last updated on 15th October 2023.

Who Is This For?

This is for visitors to our website and everyone we work with, including people who participate in our activities, supporters, volunteers, trustees, freelance staff, employees and third parties (sometimes referred to below as 'you').

The Type of Personal Information We Collect

We currently collect and process the following information:

- Personal details including, for example, name and address, email address, phone number;
- Sensitive information including, for example, information such as date of birth, socio-economic status, and nationality;
- Financial information including, for example, records of payments for purchased products and services, and bank details for paying invoices, making donations and gifting awards;
- Other personal information in relation to particular activities or volunteer roles including, for example, biographies, past relevant experience, and creative, editorial or mentoring notes and feedback;
- User statistics from our website, newsletter, social media and other online platforms we use to host or manage our work including, for example, IP address, location, newsletter views.

Information Relating to People Under 18

At times, we collect the above information for young people aged under 18. When any minor engages with a Foundation activity, they are required to share the details of their relevant parent or guardian. If a minor is selected to participate in our activity, their parent or guardian will be informed and asked to provide authorisation.

How We Get the Personal Information, Why We Have It, and How We Use It

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have subscribed to our newsletter;
- You are participating in a Foundation activity;
- You have donated (or may be considering donating) to the Foundation;
- You work in a relevant industry and we believe you have a legitimate interest in an opportunity we offer including, for example, schools are invited to participate in the Wilbur Smith Adventure Writing Prize, and publishing industry professionals are invited to attend the Wilbur Smith Adventure Writing Prize awards ceremony.

We also receive personal information from various digital sources, including when you interact with us on social media or if you have visited our website. This information is used to evaluate and improve the Foundation's work and activities.

Our website uses cookies to improve the user experience. Our website uses a cookie control system, allowing the user to consent. We use tracking software to monitor website usage, but this does not store, save or collect personal information.

We use the information that you have given us in order to:

- Keep you updated on our activities and invite you to participate, including, for example, by sending you our newsletters;
- Manage any submissions you have shared with us;
- Invite you to events;
- Communicate with you, including supplying you with information, documents, forms and other content you need to engage fully with any activity you may be participating in;
- Send you news of opportunities you may be interested in;
- Improve our charitable activities.

Occasionally, we work with third parties or partner organisations and rely on consent or legitimate interest for processing your information. You can see the list of lawful bases we rely on for processing information below. We may, for example, share information with Bonnier Books UK if you enter the New Voices award, Worldreader if you enter the Author of Tomorrow award, and literary agents who are providing an agent surgery. If we are working with a third party or a partner organisation on work that requires sharing of information, they are not allowed to use your information for their own commercial purposes or disclose it without our consent.

Sharing Your Information

Some information is intended to be shared publicly, including, for example, names, ages, location/nationality, biographies and images of the authors shortlisted for the Wilbur Smith Adventure Writing Prize. This may be shared via our social media channels, on the Foundation website, or in related press through third parties. We use this information freely in line with the Terms & Conditions of the relevant activity or with consent from the participant or participant's parent or guardian if they are under 18 years old.

We may use your information to share statistical insights about the Foundation's activities, which may include, for example, demographic information such as age, gender, or geographical location. No personal information including, for example, names or email addresses will be identifiable from such statistics.

Information We Obtain Independently From You

To better understand those we are engaging with including, for example, people who participate in our activities, event attendees, supporters and donors, we occasionally research publicly available information to estimate their potential interest in different opportunities or in supporting us. We may combine information you have given to us with additional information available from other sources. This information may include philanthropic activities, trusteeships, career history and shared interests.

Storing Your Personal Information

We keep your information only for as long as is reasonably necessary for the purposes set out in this Privacy Policy and to fulfil our legal obligations. We will not keep more information than we need.

How long we keep your information depends on the purpose for which it was collected, including, for example:

- Newsletters: once subscribed we will keep your information indefinitely/until you unsubscribe. We may clean our mailing list from time to time and, if your details are dormant, you may be removed from the list. You can always re-subscribe;
- Submission Records (creative and personal information): if you are selected to participate in a Foundation activity, we will keep your records for as long as reasonably necessary after our work together ends. If you submit but are unsuccessful, your creative information may be deleted when no longer needed. Information relevant to evaluation of our work is retained indefinitely;
- Financial Records including, for example, bank account details, invoices, donations, and purchase records: in line with The Charities Act 2011, we keep accounting records for at least six years from the end of the financial year in which they are made;
- Event Attendance: Guestlists and attendance information will usually be kept indefinitely;
- Internal Records including, for example, meeting minutes, evaluation of Foundation activities, fundraising research: materials will usually be kept indefinitely.

Otherwise, when we no longer require your information for the purposes collected, or to fulfil our legal obligations, it will be erased.

If you ask us to stop sending direct marketing communications to you, we will keep the minimum amount of your information, for example, name, address, email address and phone number to ensure we adhere with such requests.

Security

Occasionally, we provide links to other websites as a means to provide third-party information related to the Foundation including, for example, press coverage, links to purchase books, or publications relating to literacy. These third-party websites are outside our control, so we cannot vouch for the privacy policies of those sites. We recommend you check the privacy policies of each website and contact its owner if you have any concerns or questions.

No information transmission over the internet, or information in digital storage, is 100% secure. We therefore cannot guarantee the security of any information which you disclose to us and wish to draw your attention to the fact that you do so at your own risk.

Your Data Protection Rights

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- (a) Where we have your consent.** You are able to remove your consent at any time. You can do this by contacting team@wilbur-niso-smithfoundation.org. If this relates to your newsletter mailing, every edition will include a link to unsubscribe.
- (b) Where we have a contractual obligation.** We use other platforms to manage some areas of work, who will also be processing your information including, for example, the Wilbur Smith Adventure Writing Prize submissions are managed through the cloud-based platform, Submittable. Event booking is managed through Eventbrite. Our online school is hosted by Teachable. Our newsletter is administered through Brevo. We aim to select providers and processors who have a robust Privacy Policy, but you are responsible for reviewing and agreeing with their individual agreements.

- (c) **Where we have a legal obligation.** We do not intend to use this lawful basis for collecting information and will only process your information with a legal obligation if we are required to do so.
- (d) **Where we have a vital interest.** We do not intend to use this lawful basis for collecting information and will only process your information with a vital interest if we believe it is necessary (or are required by law) to do so to protect someone from harm.
- (e) **Where we have a legitimate interest.** We contact relevant individuals and organisations in their professional capacity if we believe they may have a legitimate interest in a Foundation activity including, for example, schools invited to participate in the Author of Tomorrow, publishing industry professionals invited to attend the Wilbur Smith Adventure Writing Prize awards ceremony, writing groups invited to enter the New Voices Award and books groups invited to download resources and engage with the Prize.

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

How To Complain Or Contact Us

If you have any concerns about our use of your personal information, or other queries, you can make a complaint or otherwise contact us via email at team@wilbur-niso-smithfoundation.org, or by post at Unit 9, 5-7 Wells Terrace, London, N4 3JU.

You can also complain to the ICO if you are unhappy with how we have used your information. The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>