

ICAS Foundation Privacy Notice

Who we are

The ICAS Foundation is a registered Scottish charity (No SC034836) having our office at CA House, 21 Haymarket Yards, Edinburgh EH12 5BH, United Kingdom.

Purpose

This notice explains the ICAS Foundation's approach to the personal information we handle in carrying out our activities as a registered charity. For the purposes of this Notice, we act as a **controller** of personal information, which means we are responsible for deciding how we process your personal information. Personal information means any information that we hold, or are likely to hold, relating to an identified or identifiable living individual. In practice, this means personal information we hold about users of our Website, recipients of our funding, donors and mentors.

Our commitment

The ICAS Foundation is fully committed to handling personal information in accordance with data protection legislation and best data protection practices. This means that your personal information will be:

- Processed lawfully, fairly, and in a transparent manner.
- Collected for specified, explicit and legitimate purposes.
- Only collected so far as required for our lawful purposes.
- As accurate and up to date as possible.
- Retained for a reasonable period in accordance with retention policies.
- Processed in a manner which ensures an appropriate level of security.

Whether through this notice or otherwise, the ICAS Foundation hopes to ensure that everyone has a good understanding of why the ICAS Foundation processes personal information and, where we do, the rights they may have.

Why does the ICAS Foundation need to process personal information?

The ICAS Foundation is a charity registered in Scotland and processes personal information to allow it to achieve its aims as a charity. These include the following:

- Identifying and supporting academically talented young people in need to discover their true potential.
- To ensure bursary and grant recipients meet eligibility criteria for funding.
- Mobilising the ICAS Membership as donors, mentors and facilitators.
- Securing sufficient funding that makes it possible for the ICAS Foundation to award bursaries to individuals whose parents or guardians earn under a certain threshold.
- Supporting students in securing a suitable internship during summer breaks to build skills and experience needed to enter the workplace.

To make reading this notice easier, we refer to the collection, usage, storage, sharing, management and protection of personal information as **processing**.

How does the ICAS Foundation collect personal information?

Like most organisations that handle personal information, there are various ways in which the ICAS Foundation collects information from the people it deals with.

- Email and written correspondence.
- Telephone discussions.
- Visitors to the ICAS Foundation website.
- Social media.
- Application forms and other information requests.
- Direct contact at CA House and elsewhere.

In nearly all instances, it should be obvious to you that the ICAS Foundation is collecting your personal data, including (but not limited to) when you are:

- Applying for, or receiving, financial or non-financial support from the ICAS Foundation.
- A donor, mentor or facilitator through the ICAS Foundation.
- Interacting with us as a member of the public
- Visiting our website
- Supplying us with goods or services (or your employer supplies us with goods or services)
- Attending an event

What information does the ICAS Foundation collect?

The ICAS Foundation collects personal information to fulfil its role in supporting academically talented young people from disadvantaged communities to pursue a career in accounting or finance. This is achieved by providing financial support while they are at university, a mentoring scheme with a Chartered Accountant and support to secure a paid work placement to give them key workplace skills.

As there are different aspects to this activity, the information requested and collected will vary from person to person. People who apply to the ICAS Foundation for funding are asked to complete an application form, to allow the ICAS Foundation to assess whether funding should be awarded. This requires certain information to be provided by the applicant, including:

- Name
- Contact details (including home and business addresses, email, telephone number).
- Date of birth.
- Employment details (including current and previous employers).
- Information connected to education and training (including exam results).
- Records of enquiries, meetings and other direct engagement.
- Copies of physical and electronic correspondence.
- Financial information.
- Equality information.
- Parental/guardian evidence of income to support student bursary and grant applications.
- Special category data (sensitive data), which requires us to ensure a higher level of protection, including information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, criminal convictions, offences or alleged offences, genetic data or biometric data for ID purposes. We will only collect and use special category data where we need to and if the law allows us to.
- Diversity data and information relating to the background of applicants as part of the ICAS Foundation's commitment to diversity, equity, and inclusion. While diversity data may include information which is special category data, such as ethnic origins, disability and religion, it may also include information which is not special category data, such as social mobility, educational background, parental income and entitlement to free school meals.

Information provided to us indirectly:

- Your information will be shared with us by ICAS if you make a donation to the ICAS Foundation in your Annual Renewal. In this situation ICAS will share with us your name, donation amount, ICAS membership number, email address, gift aid information, home address (country only), and whether or not you opt-in to communications from the ICAS Foundation.

The ICAS Foundation will continue to process the personal information of individuals who are successful in their applications for financial or non-financial support. In addition to the information provided in the application form, the ICAS Foundation will need to process information in connection with the individual's ongoing studying, including:

- The university at which they are studying

- The details of the course(s) they are enrolled
- Exam results
- Evidence of matriculation

In pursuing its aims as a charity, the ICAS Foundation will sometimes need to process the personal information of third parties, including:

- The Trustees of the ICAS Foundation
- Mentors, who have agreed to support students in receipt of funding
- Individuals who have donated to the ICAS Foundation

Your personal information does not include personal information where identifiers that associate that data with you have been removed. We term this **anonymous data**. Aggregated data could be derived from your personal information but is not considered personal information in law as this data will not directly or indirectly reveal your identity. We may collect, use and share **aggregated data** such as statistical or demographic data for any purpose.

Where we need your personal information to enter into or perform a contract with you then if you don't provide it, we may not be able to perform the contract we have or are trying to enter into with you.

What is the lawful basis for the ICAS Foundation processing activities?

The ICAS Foundation will only process personal information where we believe we have a lawful basis to do so. The basis for processing will vary from activity to activity. In some instances, processing may have more than one lawful basis.

The information below summarises the basis on which the ICAS Foundation processes personal information.

| Lawful basis | Examples of processing activities |
|--|--|
| Processing is necessary for the ICAS Foundation to meet its legitimate interests as a charity. | Managing the ICAS Foundation through a Board of Trustees. |
| | Receiving, assessing, and awarding applications for funding. |
| | Maintaining contact with individuals in receipt of funding (during and after completion of studies). |
| | Corresponding with individuals in respect of the work of the ICAS Foundation. |
| | Providing a mentoring programme for students. |
| | Receiving donations from third parties. |
| Processing is necessary for the ICAS Foundation to comply with its legal obligations; including performance of a contract. | Capturing photography and video at events. |
| | CCTV images. |
| | Providing information to statutory bodies (e.g. OSCR). |
| | Processing applications for funding. |
| | Processing applications to become a mentor. |

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| | Ongoing administration of funding where application was successful. |
| Consent | Processing will generally be made at the request of the data subject – whether through submission of an application form, application to serve as a mentor, or appointment as a trustee. |
| Processing carried out to review equality of opportunity or treatment | Reporting on ICAS membership diversity. Publishing diversity information on our website. |
| Processing carried out in the public interest to promote equality of opportunity or treatment (for processing of special category data) | Carrying out equal opportunities monitoring. Reporting on ICAS membership diversity. Carrying out equal opportunities monitoring. |

How does the ICAS Foundation share personal data with 3rd parties?

Some of the processing activities set out above require the ICAS Foundation to share personal information with third parties. Whenever we share personal data, we take all reasonable steps to ensure it will be handled appropriately and securely by the third party.

The Institute of Chartered Accountants of Scotland (ICAS) provides ongoing support to the ICAS Foundation to allow it to operate. This includes administrative and technical support, provision of payroll and HR, bookkeeping and financial accounts services, marketing and IT.

In addition, the ICAS Foundation shares personal information with the following main third parties:

- The ICAS Foundation Board of Trustees, who are responsible for the management of the ICAS Foundation.
- Joint funding partners such as universities or other charities which require information as a condition of funding.
- Statutory bodies (e.g. OSCR).
- Mentors, where a student and a mentor have agreed to participate in a mentoring programme.
- Using the same networks as ICAS, software providers which allow the ICAS Foundation to operate efficient digital processes, including:

| | | |
|-------------|-----------|--------------|
| Enthuse | Mailchimp | Salesforce |
| Go Cardless | Microsoft | FormAssembly |

For practical reasons, this is an indicative, but not exhaustive list. Please also note that the list may be updated from time to time.

How long does the ICAS Foundation retain personal information?

The periods for which the ICAS Foundation retains personal information depend on the purpose for which the information was obtained but, in general terms, we will retain personal data for so long as required by law, or as may be required for record keeping and legal claims purposes. Please contact us if you would like more information about this.

Where does the ICAS Foundation store personal information?

Personal information is mostly processed by ICAS Foundation staff at our offices in the UK. To allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). The ICAS Foundation uses the IT facilities of ICAS to undertake its work. Personal information is held in files with access restricted to ICAS Foundation staff.

Given the ICAS Foundation's close connection to ICAS, which has members and firms in more than 100 countries around the world, there may sometimes be occasions when information is transferred outside the EEA. Where this happens, the ICAS Foundation will take all reasonable steps to ensure that the personal information is properly protected.

CCTV

Visitors should be aware that the ICAS Foundation uses Closed Circuit Television ("CCTV") in or around some of its places of business, including at CA House, Edinburgh. All use of CCTV is in accordance with the law and other guidance, including the ICO's Code of Practice.

As more fully explained in ICAS' CCTV Policy, ICAS only uses CCTV to the extent that it is considered a necessary and proportionate step to achieve legitimate purposes, including the following:

- To provide a safe and secure environment for ICAS employees and any visitors to ICAS' places of business.
- To prevent the loss of or damage to ICAS' property (including buildings and/or assets).
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

IP addresses

The ICAS Foundation may collect information about the computer or device which is used to access <http://www.icasfoundation.org.uk/>. Such information is used to improve the user experience, and to help the ICAS Foundation to better understand the ways in which its website is used. This may include information about:

- The computer or device type.
- IP addresses.
- Operating systems.
- Browser type and version.
- Time zone setting and browser plug-in types and versions.

This is statistical data about users' browsing actions and patterns. It is collected on an anonymous, aggregated basis, and does not identify individual users.

Cookies

The ICAS Foundation website uses cookies to make our website work as you would expect and to help provide you with the best experience we can. Cookies are small text files that are placed on your device when you browse websites to make your visit smoother and to enable website owners to analyse user behaviour.

You may refuse to accept cookie files when visiting our site, by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you choose this setting, you may not get an optimal web site experience and be unable to access certain parts of our site.

The ICAS Foundation may also use analytical cookie files. These allow the ICAS Foundation to recognise and count the number of visitors to the website and to see how visitors move around the site when using it. This helps the ICAS Foundation to improve the way the site works, for example, by ensuring that users are finding what they are looking for easily.

A user who wishes to delete any such cookie files should please refer to the instructions for file management software to locate the file or directory that stores cookies. Cookies will contain the domain name icasfoundation.org.uk within the file name.

Your rights where the ICAS Foundation is processing your information

The law in the UK gives certain rights to individuals whose information is being processed by a third party. The following is a quick summary of these rights:

Access to your information – you have the right to request a copy of the personal information about you that the ICAS Foundation holds.

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

Correcting your information – the ICAS Foundation wants to make sure that your personal information is accurate, complete, and up to date, and so you may ask the ICAS Foundation to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask the ICAS Foundation to delete personal information about you where:

You consider that the ICAS Foundation no longer requires the information for the purposes for which it was obtained

ICAS Foundation is using that information with your consent and you have withdrawn your consent – see ‘withdrawing consent to using your information’ below.

You have validly objected to ICAS Foundations use of your personal information – see ‘objecting to how we may use your information’ below.

ICAS Foundations use of your personal information is contrary to law or ICAS Foundations other legal obligations.

Objecting to how we may use your information – you have the right at any time to require the ICAS Foundation to stop using your personal information for direct marketing purposes. In addition, where the ICAS Foundation uses your personal information to perform tasks carried out in the public interest, or in exercising official authority vested in it then, if you ask us to, the ICAS Foundation will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to ICAS Foundations use of your information. The right might also apply if the ICAS Foundation no longer has a basis for using your personal information, but you don't want the ICAS Foundation to delete the data. Where this right is validly exercised, the ICAS Foundation may only use the relevant personal information with your consent, for legal claims, or where there are other public interest grounds to do so.

Withdrawing consent using your information – where the ICAS Foundation uses your personal information with your consent, you may withdraw that consent at any time, and the ICAS Foundation will stop using your personal information for the purpose(s) for which consent was given.

Please contact the ICAS Foundation in any of the ways set out in the ‘contact information and further advice’ section if you wish to exercise any of these rights.

Changes to our privacy policy

The ICAS Foundation keeps this notice under regular review and will place any updates on this website. Paper copies of the privacy statement may be obtained by emailing enquiries@icasfoundation.org.uk <mailto:regulation@icas.com> or in writing to our office at CA House, 21 Haymarket Yards, Edinburgh EH12 5BH.

This privacy statement was last updated on 17 December 2024.

Contact information and further advice

If you have any questions which are not covered in this notice, we suggest that you email us at enquiries@icasfoundation.org.uk. To help us deal with your query as quickly as possible, we recommend that you include the following in the email subject 'FAO Data Protection Officer'. If you would prefer to submit your questions in writing, please write to our office at CA House, 21 Haymarket Yards, Edinburgh EH12 5BH, addressing your letter to the Data Protection Officer, ICAS Foundation.

Complaints

While the ICAS Foundation seeks to resolve directly all complaints about how we handle personal information, you also have the right to lodge a complaint with the Information Commissioner's Office, whose contact details are as follows:

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

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>