



## Wellcome Grants Privacy Statement

Wellcome is committed to safeguarding your personal information. This Statement explains how we collect, store, and use personal information from grant applicants, grantholders, grant participants (e.g. co-investigator, sponsor, supervisor, collaborator), staff employed through grants and external reviewers and advisors (e.g. peer reviewers and committee members) for the purpose of awarding and managing grants and monitoring, evaluating, researching and learning about what Wellcome funds and how we fund it. It also sets out the legal basis on which we do this.

We will only use personal information when the law allows us to. Most commonly, we collect and use your information where it is necessary for us to pursue our legitimate interests (or those of a third-party) where your interests and fundamental rights do not override those interests.

It is important that you read our Privacy Statement so that you are aware of how and why we are using your information. This Statement should be read alongside our attached [Confidentiality Statement](#).

For ease of reference, we have broken our Privacy Statement down into the following click-through sections:

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# Wellcome Grants Privacy Statement

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We may make changes to this Statement so please check from time to time for any updates.

The Wellcome Trust Limited is a charitable company limited by guarantee incorporated in England and Wales (company number 2711000) (as trustee of the Wellcome Trust (a registered charity with number 210183)) (“**Wellcome**”).

Wellcome is the “data controller” of your personal information. This means that we are responsible for deciding how we hold and use personal information about you.

## 1. The kind of information we hold about you, how we collect and use it and our legal basis for doing so

Your personal data, or personal information, is any information about you from which you can be identified. It does not include information where your identity has been removed (anonymised data).

We collect, store and use a range of personal information relating to grant applicants, grantholders, grant participants, staff employed through grants and external reviewers and advisors (e.g. peer reviewers and committee members) in connection with awarding and managing grants and monitoring, evaluating, researching and learning about what Wellcome funds and how we fund it. This sometimes includes certain “special categories” of more sensitive personal information which require a higher level of protection under data protection law.

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

- Where it is necessary for us to pursue our legitimate interests (or those of a third-party) where your interests and fundamental rights do not override those interests. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#);
- Where, as applicable, you have given us your consent to use the diversity monitoring information you provide to us, or to send you marketing communications.

Where we use your information on the basis of your consent, you have the right to withdraw your consent at any time by: in the case of diversity monitoring information collected through WT Grant Tracker, logging into your WT Grant Tracker portal account and selecting ‘prefer not to say’ against the relevant question under the ‘manage my details’ section, in the case of marketing communications, unsubscribing using the ‘unsubscribe option’ in communications sent to you, or by logging into your WT Grant Tracker portal account and unticking the relevant box under the ‘manage my details’ section or by contacting our [Data Protection Officer](#).

We set out below a description of the personal information we collect, the ways we use your information, and the legal basis on which we do this. Where we are using your information on the basis that we are pursuing our legitimate interests, we have also identified what our legitimate interests are. Further information on this is available from our [Data Protection Officer](#).

## **(a) When you are considering applying for a Wellcome grant**

**You may choose to give us certain information about** you when you are considering applying for Wellcome funding (at the pre-application stage) such as:

- your name;
- contact phone number;
- email address;
- CV including education/training and career history;
- details of your proposal.

**We may also collect additional information about you** from external sources e.g. grant outputs such as publications and works, patents, clinical trials as well as citations of these outputs collected from sources such as publicly or privately curated databases e.g. EuropePMC. We may also collect information about you in specific circumstances from external reviewers or advisors where a formal decision is required prior to invitation to a full application.

**We use your information for:**

- assessing your eligibility and suitability for Wellcome funding;
- understanding your proposed application;
- corresponding with you to advise you on your proposed application.

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interests as a funder (and your interests as an applicant) to provide advice and support to those seeking Wellcome funding, in furtherance of our charitable aims. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **(b) When you are applying for a Wellcome grant**

**We may collect the following information from you**, as a lead applicant or participant (e.g. co-investigator, sponsor, supervisor, collaborator), when you apply for a grant via our grants application and management system, WT Grant Tracker:

- first name, last name, title, ORCID ID;
- nationality;
- address, email address and telephone numbers;
- CV including education/training and career history;
- information relating to career breaks. We will not request or hold information that is considered special category personal data such as health-related information;
- letters of support;
- details of proposal;
- with your consent, information relating to date of birth, gender, ethnicity and race and disability for diversity monitoring purposes (see: [Diversity Monitoring](#) below).

**We may also collect additional information about you** relating to your application from external sources e.g. grant outputs such as publications and works, patents, clinical trials as well as citations of these outputs collected from sources such as publicly or privately curated databases e.g. EuropePMC. We may also collect information about you from external reviewers and advisors (e.g. peer reviewers and committee members).

**We use your information for:** A) Awarding and managing grants, and B) Analysis of what Wellcome funds and how we fund it.

### **A) Awarding and managing grants**

We use your information for:

- setting up and administering your user account on WT Grant Tracker (providing you with a user

- name and password) so that you can submit your application;
- processing your application and assessing your eligibility and suitability for Wellcome funding;
- reviewing your application both internally and externally using external reviewers or advisors (e.g. peer reviewers and committee members);
- contacting you about your application; and
- administering our grants system (including troubleshooting, testing, system maintenance and support).

**We may share your information** for these purposes with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA, (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners (e.g. Research Councils, Royal Society) for monitoring and reporting purposes under the terms of our partnership; and
- external reviewers and advisors (e.g. peer reviewers and committee members) who may be based at academic institutes or in the private sector, for the purpose of reviewing your application and making funding recommendations.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** it is necessary for us to pursue our legitimate interests as a funder (and the interests of those we fund) in providing grant funding. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

Where you have given us your opt-in consent via WT Grant Tracker, we may also contact you about other Wellcome activities and events that may be of interest such as informing you about other funding opportunities or Wellcome Collection events.

## **B) Analysis of what Wellcome funds and how we fund it**

We use your information for:

- monitoring and reporting purposes e.g. award rates and trends in application decisions;
- evaluating and reporting purposes (where it could be combined with other data) e.g. the fairness and efficiency of application decisions; and
- research, learning and reporting purposes (where it could be combined with other data) e.g. to determine the geographical reach of institutions that Wellcome funds or directly interacts with relative to our peer funding organisations.

**We may share your information** for these purposes with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA, (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners academic and commissioned commercial researchers investigating research questions related to our funding mechanisms; and
- academic and commercial evaluators commissioned to evaluate areas such as the effectiveness, efficiency and impact of our funding and the research we fund.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interest as a funder (and the legitimate interests of those we fund) to understand what Wellcome funds and how we fund it. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **(c) When you are a Wellcome grantholder or a participant on an awarded grant (both during, and after completion of, the award)**

**We may collect the following information from you:** in addition to the information we hold from the grant application stage, on lead applicants and participants on a grant, once a Wellcome grant is awarded, we may collect the following additional information for the ongoing management of a Wellcome grant:

- bank details to award and administer your grant;
- quarterly and end of grant spend information;
- annual and end of grant information which may contain information about you as a grantholder or participant on a grant, as well as details of the progress and outputs of your grant or information collected routinely as part of project oversight or monitoring;
- information relating to post-award issues such as requests for supplements or extensions due to unforeseen delays, parental leave, sick leave or other such circumstances. We will not request or hold information that is considered special category personal data such as health-related information
- survey information collected during or after completion of the award e.g. Wellcome Trust Career Tracker;
- with your consent, information relating to date of birth, gender, ethnicity and race and disability for diversity monitoring purposes (see: [Diversity Monitoring](#) below).

**We may also collect additional information about you** relating to your grant, from external sources e.g. grant outputs such as publications and works, patents, clinical trials as well as citations of these outputs collected from sources such as publicly or privately curated databases e.g. EuropePMC. We may also collect information about you from external reviewers and advisors e.g. committee members.

**We use your information for:** A) Awarding and managing grants, B) Analysis of what Wellcome funds and how we fund it, and C) Offering external reviewer opportunities

### **A) Awarding and managing grants**

**We use your information for:**

- administering and managing your grant;
- setting up and administering you or your organisation's user account on WT Grant Tracker so that we can manage the funds on your grant;
- monitoring the progress of your grant and ensuring that funds awarded are being applied in accordance with our grant conditions, notifying you about changes to our grant schemes, conditions, policies or privacy terms;
- inviting you to attend or participate in meetings run by Wellcome or that Wellcome are involved in which are of relevance to your grant, e.g. Fellow's meetings;
- as a user of WT Grant Tracker, administering the grants system (including troubleshooting, testing, system maintenance and support); and
- contacting you for feedback and suggestions for improvements on the way we do things that would benefit you as a Wellcome grantholder.

**We may share your information** with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners (e.g. UK Research Councils, Royal Society) for monitoring and reporting purposes under the terms of our partnership; and
- external reviewers and advisors (e.g. project oversight groups, grant monitors, evaluation specialists) for the purpose of reviewing, monitoring or evaluating your grant.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We also publish information**, such as grantholder name and application title on our corporate website, and external websites such as 360 Giving and EuropePMC .

**We use your information in this way on the legal basis that** it is necessary for us to pursue our legitimate interests as a funder (and the interests of those we fund) to ensure that awarded funds are applied for their approved purposes in accordance with our grant conditions, that grantholders receive the support they require from Wellcome and that Wellcome-funded grant activities achieve their outcomes. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

Where you have given us your opt-in consent via WT Grant Tracker, we may also contact you about other Wellcome activities and events that may be of interest such as informing you about other funding opportunities or Wellcome Collection events.

## **B) Analysis of what Wellcome funds and how we fund it**

We use your information for:

- monitoring and reporting purposes e.g. trends in funding areas for our awarded grants;
- evaluating and reporting purposes (where it could be combined with other data) e.g. impact and reach of Wellcome funding; and
- research, learning and reporting purposes (where it could be combined with other data) e.g. to compare demographic make-up of Wellcome's funding areas or to determine how sponsors are used to optimise the outputs from the award.

**We may share your information** for these purposes with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA, (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners, academic and commissioned commercial researchers investigating research questions related to our funding mechanisms; and
- academic and commercial evaluators commissioned to evaluate areas such as the effectiveness, efficiency and impact of our funding and the research we fund.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interest as a funder (and the legitimate interests of those we fund) to understand what Wellcome funds and how we fund it. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **C) External reviewer opportunities**

We might also use your information to:

- contact you to offer you the opportunity to act as an external reviewer or advisor (e.g. committee member or peer reviewer) on other applications for Wellcome funding.

**We use your information in this way on the legal basis that** it is necessary for us to pursue our legitimate interest as a funder to ensure that applications for Wellcome funding are peer reviewed and appraised by subject matter experts to ensure that appropriate funding decisions are made. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **(d) Where you are a participant on a Wellcome grant: misconduct, change of status**

## information

As a participant involved in Wellcome funding (e.g. co-investigator, sponsor, supervisor, collaborator), research staff member, student, fieldworker, collaborator, consultant, or sub-awardee, Wellcome advisory committee member, we may also collect the following information from Wellcome-funded organisations:

- information about you that Wellcome-funded organisations are required to provide to us (under our grant conditions) relating to misconduct, a change to your status (as a grantholder) or any other behaviour or actions relating to you that may adversely affect the grant activities or compliance with our grant conditions.

**We use this information** to check that such claims are investigated appropriately and that appropriate sanctions are applied where claims are upheld.

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interest as a funder of ensuring that: awarded funds are applied for their approved purposes in accordance with our grant conditions, grantholders receive the support they require from Wellcome, Wellcome-funded grant activities achieve their outcomes, and appropriate sanctions are in place to mitigate any risks to Wellcome-funded activities and individuals.

### **(e) Where you are a staff member employed through a Wellcome-funded grant**

**We collect the following information from you** through annual progress or end of grant reports:

- name;
- role on grant;
- email address;
- ORCID ID.

**We may also collect additional information about you** relating to the grant you are on from external sources e.g. grant outputs such as publications and works, patents, clinical trials as well as citations of these outputs collected from sources such as publicly or privately curated databases e.g. EuropePMC.

**We may also collect the following additional information about you** through a diversity monitoring survey:

- with your consent, information relating to date of birth, gender, ethnicity and race and disability for diversity monitoring purposes (see: [Diversity Monitoring](#) below).

**We use your information for:** A) Awarding and managing grants, and B) Analysis of what Wellcome funds and how we fund it.

#### **A) Awarding and managing grants**

**We use your information:**

- to better understand the research work force we support through our grants and their research careers; and
- to contact you to ask you to complete a diversity monitoring questionnaire, to understand the diversity of those working on Wellcome-funded grants.

**We may share your information** for this purpose with our funding partners, some of whom may be based outside of the EEA, (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\)](#) below). Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** it is necessary for us to pursue our legitimate interests as a funder (and the interests of those we fund) to ensure that awarded funds are applied for their approved purposes in accordance with our grant conditions, that grantholders receive the support they

require from Wellcome and that Wellcome-funded grant activities achieve their outcomes. We collect and analyse diversity monitoring data in pursuit of our legitimate interest of becoming a more diverse and inclusive funder by monitoring the diversity of those we fund, on the basis of your consent. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **B) Analysis of what Wellcome funds and how we fund it**

### **We use your information for:**

- monitoring and reporting purposes e.g. inform Wellcome's work around diversity and inclusion amongst the individuals we fund through our grants;
- evaluating and reporting purposes (where it could be combined with other data); and
- research, learning and reporting purposes (where it could be combined with other data) e.g. to investigate how training requirements can be optimised with institutional support.

**We may share your information** with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA, (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners, academic and commissioned commercial researchers investigating research questions related to our funding mechanisms; and
- academic and commercial evaluators commissioned to evaluate areas such as the effectiveness, efficiency and impact of our funding and the research we fund.

Only anonymised diversity monitoring information will be shared.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interest as a funder (and the legitimate interests of those we fund) to understand what Wellcome funds and how we fund it and of becoming a more diverse and inclusive funder by monitoring the diversity of those working on Wellcome-funded grants. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **(f) Where you are a peer reviewer**

**We collect the following information about you** from third parties who recommend you, institution websites and other external sources e.g. grant outputs such as publications and works, as well as citations of these outputs collected from sources such as publicly or privately curated databases e.g. EuropePMC:

- name and email address;
- organisation;
- area of expertise.

**We use your information for:** A) Awarding and managing grants, and B) Analysis of what Wellcome funds and how we fund it.

### **A) Awarding and managing grants**

We use your information to:

- determine your suitability as a reviewer;
- contact you to invite you to participate in peer review;
- send you a link via email to review relevant application material via WT Grant Tracker;
- receive back from you the details of your peer review which we will share with our external reviewers



- or advisors e.g. committee members and also feedback to our applicants anonymously;
- otherwise correspond with you in connection with peer reviewing an application; and
- contact you for feedback and suggestions for improvements on the way we do things that would benefit you as a peer reviewer.

**We may share your information** with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners (e.g. Research Councils, Royal Society) for monitoring and reporting purposes under the terms of our partnership; and
- external reviewers or advisors (e.g. committee members) for the purpose of reviewing and making funding recommendations.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We will attribute your review:** if you provide a review we will list your name as a peer reviewer on our website in recognition of your contribution to our work and where possible include your name in a letter of thanks to a senior member of your organisation, unless you inform us that you do not wish to be acknowledged in this way.

**We use your information in this way on the legal basis that** we are pursuing our legitimate interests as a funder (and those we fund) in obtaining peer review of Wellcome applications by subject matter experts to ensure that appropriate funding decisions are made. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **B) Analysis of what Wellcome funds and how we fund it**

**We use your information for:**

- monitoring and reporting purposes e.g. trends in nationality of Wellcome peer reviewers;
- evaluating and reporting purposes (where it could be combined with other data) e.g. effectiveness of peer review in awarding grants that yield high impact research; and
- research, learning and reporting purposes (where it could be combined with other data) e.g. to compare funding decisions relating to different peer reviewer mechanisms.

**We may share your information** with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners, academic and commissioned commercial researchers investigating research questions related to our funding mechanisms; and
- academic and commercial evaluators commissioned to evaluate areas such as the effectiveness, efficiency and impact of our funding and the research we fund.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interest as a funder (and the legitimate interests of those we fund) to understand what Wellcome funds and how we fund it. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **(g) Where you are an external advisor e.g. committee member**

**We collect the following information from you** some of which we may already hold if you have previously interacted with WT Grant Tracker:

- name, contact email, address, bank details to pay you for your services as a committee member;
- biographical information such as area of expertise; and
- with your consent, we may also collect the following information for diversity monitoring purposes (see [Diversity Monitoring](#) below): date of birth, gender, ethnicity and race and disability information.

**We may also collect additional information about you** relating to your role as an external advisor from external sources e.g. grant outputs such as publications and works, as well as citations of these outputs collected from sources such as publicly or privately curated databases e.g. EuropePMC.

**We use your information for:** A) Awarding and managing grants, and B) Analysis of what Wellcome funds and how we fund it.

### **A) Awarding and managing grants**

We use the information we hold on you to:

- understand your areas of expertise;
- administer our relationship with you as an external advisor, including (if you don't already have an account, creating a WT Grant Tracker account for you);
- correspond with you about committee meetings and proceedings;
- assess any potential conflicts of interest;
- as a user of WT Grant Tracker, administer the grants system (including troubleshooting, testing, system maintenance and support); and
- contact you for feedback and suggestions for improvements on the way we do things that would benefit you as a committee member.

**We may share your information** for these purposes with individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside of the EEA (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners (e.g. Research Councils, Royal Society) for monitoring and reporting purposes under the terms of our partnership; and
- other external advisors (e.g. committee members) for the purpose of reviewing and making funding recommendations.

Further information on how we share your information is available from our [Data Protection Officer](#).

**We use your information in this way on the legal basis that** it is necessary for us as a funder to manage Wellcome committees to ensure that they operate appropriately and that ultimately applications for Wellcome funding are appropriately reviewed and appraised by subject matter experts to ensure that appropriate funding decisions are made. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

Where you have given us your opt-in consent via WT Grant Tracker, we may also contact you about other Wellcome activities and events that may be of interest such as informing you about other funding opportunities or Wellcome Collection events.

### **B) Analysis of what Wellcome funds and how we fund it**

We use your information for:

- monitoring and reporting purposes e.g. trends in gender of committee members in different funding streams;
- evaluating and reporting purposes (where it could be combined with other data) e.g. relevance of committee member advice in funding decisions; and
- research, learning and reporting purposes (where it could be combined with other data) e.g. to investigate the effects of different types of committee set ups on funding advice.

**We may disclose your information** for these purposes to individuals and organisations outside Wellcome who are connected to or working on behalf of Wellcome, some of whom may be based outside the EEA (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)), including:

- other funding partners, academic and commissioned commercial researchers investigating research questions related to our funding mechanisms;
- academic and commercial evaluators commissioned to evaluate areas such as the effectiveness, efficiency and impact of our funding and the research we fund.

Further information on how we share your information is available from our Data Protection Officer.

**We use your information in this way on the legal basis that** we need to, to pursue our legitimate interest as a funder (and the legitimate interests of those we fund) to understand what Wellcome funds and how we fund it. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

## **(h) Information we keep in our corporate archive and our collections within Wellcome Collection**

For the purpose of archiving in the public interest, we permanently archive certain information, which we hold within our corporate archive and our collections in Wellcome Collection. This is information that supports the preservation of Wellcome's historical, cultural and public engagement resources and activities, and funding activities. For example, meeting papers of grant funding committees and panels, grant files (for Wellcome grant award holders), grant outputs from specific awards and grant publications.

With appropriate safeguards in place to ensure that private and confidential information in our collections and corporate archive is accessed and handled appropriately, this information is made available to researchers in accordance with Wellcome Collection's [Access Policy](#) and [procedures](#) and Wellcome's information governance procedures.

**We use your information in this way on the legal basis that** we are archiving in the public interest.

Please note that we may also use your personal data without your knowledge or consent, where this is required by law.

## **2. How we use particularly sensitive personal information: Diversity monitoring information**

"Special categories" of particularly sensitive personal information that we hold about you require higher levels of protection under data protection law. We need to have further justification for collecting, storing and using this type of personal information.

We only collect "special category" sensitive information with your consent when you provide diversity monitoring information to us i.e. as a grantholder, participant, staff employed on grant or external advisor (e.g. committee member). If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Diversity monitoring is central to Wellcome's diversity and inclusion work and is an important means of identifying patterns of under-representation and differential experience related to certain groups of people, particularly the groups of individuals protected by law under the Equality Act 2010, implementing targeted actions to respond to identified challenges, and promoting equality and fairness for all.

The information we use for diversity monitoring is collected and used in pursuit of our legitimate interest of becoming a more diverse and inclusive funder. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

With your consent, we collect, store and use personal data relating to your date of birth and gender as well as other types of more sensitive personal information (“special category personal data”) about ethnicity and race and disability. See below for further information on how we will use this data and how you can withdraw your consent to us using your personal information (if you change your mind).

### **How to withdraw your consent**

Once you have provided the above special categories of information and consented to us using them for diversity monitoring purposes, you have the right to withdraw your consent at any time by logging into the Wellcome Trust Grant Tracker portal and changing your preferences. We will stop using your information within a reasonable period of you withdrawing your consent.

### **How this information will be used**

We will use the above categories of information to obtain an overview of Wellcome’s grant funding profile, monitor the diversity of successful and unsuccessful grant applicants at each decision-making point, ensure the diversity of those involved in our advisory committees, benchmark ourselves against other funders, and national and international statistics, set meaningful targets and measure progress.

This data will be cross-referenced with other personal information collected about Wellcome grantholders, applicants, participants, staff members and committee members. The type of information that will be used for cross-referencing includes success rates for application, size of award, and grant type. This will enable Wellcome to understand different patterns of success, participation, and experience within our grant portfolio and grant decision-making processes, or review areas where policies and processes appear to be impacting disproportionately on certain groups, particularly the groups of individuals protected by law under the Equality Act 2010. This will enable the Diversity and Inclusion Team, and other teams within Wellcome, to concentrate on developing tailored solutions and making relevant changes, rather than using guesswork or assumptions. Furthermore, we will use this data to set meaningful targets and monitor and evaluate the Diversity and Inclusion team’s progress (at an aggregated level) – required annually by Wellcome’s Executive Leadership Team.

### **How this information will be shared**

The above categories of information will be shared with a limited number of designated Wellcome Trust Grant Tracker system and database administrators, and data analysts in Wellcome’s Grants division.

In cases where Wellcome provides funding in partnership with an organisation, such as the Royal Society, this data will be shared with our funding partners once Wellcome is assured that their systems meet GDPR requirements.

A ‘pseudonymised’ version of this diversity data (i.e. with names removed) will be shared with individuals in Wellcome who have been approved through a Wellcome Data Protection Impact Assessment. These individuals will produce and/or view reports containing analysed diversity data. Whilst the data in these reports will be anonymised as far as possible, it may still be possible to identify certain individuals through some combinations of this data – for example gender plus ethnicity plus institution.

Fully anonymised reports (where no individual can be identified) will be shared more widely with Wellcome’s Executive Leadership and Senior Leadership Teams on at least an annual basis. Key findings (fully anonymised) will be shared with the wider organisation and externally, via channels such as Wellcome’s external website.

## **3. If you fail to provide personal information**

If as a grant participants or lead applicant you fail to provide certain personal information when requested during the grant application process, we will not be able to process the grant application. If as a committee member you fail to provide certain personal information when we are setting up your terms of appointment, we will not be able to progress your appointment.

## 4. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## 5. How we share your information

We may share your personal information within Wellcome for awarding and managing grants and monitoring, evaluation, research and learning purposes, as well as with third-parties, including funding partners, external reviewers and advisors, partner organisations and third-party service providers.

We share your personal data with the parties set out below for the purposes set out in paragraph 1 above, some of whom may be based outside the EEA (in which case please see [International transfers of your information- outside of the European Economic Area \(EEA\) below](#)).

Within Wellcome:

- Staff within Wellcome will access grant-related information for the purpose of awarding and managing grants and monitoring, evaluation, research and learning about what Wellcome funds and how we fund it.

Outside Wellcome:

- funding partners e.g. the UK Research Councils, World Health Organisation, Royal Society;
- other partners/third parties such as universities and research institutes and for the purposes of monitoring, evaluation, research and learning; and
- external reviewers and advisors (e.g. peer reviewers, committee members or others who advise Wellcome on award progress or represent Wellcome on award project oversight groups).

We require all third parties to respect the security of your personal information and to 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.

### Third-party service providers

Where necessary, we may share your personal information with third-party service providers, suppliers, partners, associated organisations and agents. For example, the provider of our grants application and management system, WT Grant Tracker and the provider of our request tracking system, Zendesk.

### Where otherwise required to do so

In exceptionally rare circumstances, we may be required to share your information if required to do so under a court order or if requested by the police or other regulatory or governmental authority.

Further information on the third parties we share your information with is available from our [Data Protection Officer](#).

## 6. How we look after your information

Wellcome is committed to safeguarding your personal information and your privacy. 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 employees, agents, contractors and other third 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.

Where we have given you (or where you have chosen) a password to access certain parts of our sites, you are responsible for keeping this password confidential.

### **Technical solutions**

We securely store all information you provide to us using one or more technical measures considering the nature, scope, context and purpose for which we are using the information. Such measures will always be appropriate to the risk.

### **Breach Procedures**

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

### **International transfers of your information- outside of the European Economic Area (EEA)**

We may share grant applicant personal information with external peer reviewers and external committee members, some of whom may be based outside the EEA in locations that have less stringent data protection requirements. We share grant applicant personal information with our service provider, Zendesk, provider of our support request logging and tracking system, which uses Amazon Web Services hosted in the US.

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- We make our own assessment of the adequacy of the security arrangements in place for the information being transferred and the manner in which it is being provided;
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please Contact our [Data Protection Officer](#) for further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. How long we keep and use your information**

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it. This may mean holding on to your personal information for a certain period of time after you have ceased to have a relationship with Wellcome, such as for the purposes of satisfying any legal, accounting, or reporting requirements.

If you withdraw your consent to us using diversity monitoring information containing special categories of sensitive personal information where you are identified, we will cease to store and use this information within a reasonable period of you withdrawing your consent.

When determining the appropriate period of time to retain your personal information, we consider several factors, including 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 handle and use your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We securely erase your information once it is no longer needed. Details of retention periods for different aspects of your personal data are set out in our retention policy Contact our [Data Protection Officer](#) for further information.

For the purpose of archiving in the public interest, we permanently archive certain information, which we hold within our corporate archive and our collections in Wellcome Collection. This is information that supports the preservation of Wellcome's historical, cultural and public engagement resources and activities, and funding activities. See the section [Information we keep in our corporate archive and our collections within Wellcome Collection](#) for further information.

## 8. Your rights over your information

Under data protection law, you have certain rights over your information. Further information on your rights and how to exercise them is set out below.

If you have an online account with us, we hope that you find your information is easy to access and update as it is important that the personal information we hold about you is accurate and current.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below);
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes;
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer** of your personal information to another party; and
- **Withdraw your consent** for us to use your personal information at any time.

If you would like to exercise any of the rights mentioned above, please contact our [Data Protection Officer](#).

In almost all circumstances, you can exercise any of these rights free of charge. However, in circumstances where your request for access is unfounded or excessive we may charge you a reasonable administrative fee or simply refuse to respond.

Although we hope that you would never feel that you had to, you do have the right to lodge a complaint with the UK supervisory authority for data protection issues, the Information Commissioner's Office – [www.ico.org.uk](http://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.

## 9. Changes to this Statement and your duty to inform us of changes

This Statement was last updated on 23 May 2018. To make sure it is up to date and accurate, we make changes to this Statement from time to time. Therefore, we ask that you come back every now and then to check for any updates. We may also notify you in other ways from time to time about the handling and use of your personal information.

It is important that the personal data we hold about you is accurate and current. Where you have a WTGT account, please update your profile on WTGT if your personal data changes during your relationship with us.

## 10. Further information

If you have any questions about this Statement or how we handle your personal information, please contact Wellcome's Data Protection Officer:

Data Protection Officer

Wellcome Trust  
215 Euston Road  
London NW1 2BE  
United Kingdom  
[dataprotection@wellcome.ac.uk](mailto:dataprotection@wellcome.ac.uk).

Further information on data protection law can be found here: <https://ico.org.uk/for-the-public>



## **Appendix**

### **Confidentiality Statement**

We will handle in confidence the information you supply during the application process that is marked as, or ought reasonably be considered to be, confidential ("**Confidential Information**"). We will:

- a. take reasonable care to keep the Confidential Information secret and secure;
- b. use the Confidential Information only for the purposes set out in the Privacy Statement above; and
- c. only disclose it to third parties under conditions of confidentiality and only as necessary to fulfil those purposes.

We will not be under any obligation to keep the Confidential Information confidential to the extent that the Confidential Information:

- a. was already lawfully known to us at the date it was disclosed to us;
- b. becomes public through no fault of ours;
- c. is lawfully disclosed by a third party to us without any obligations of confidentiality being placed on us; or
- d. is developed independently by our employees without reference to your information.

We will be entitled to disclose any Confidential Information to any court, administrative or regulatory body to the extent required by law but will endeavour to inform you of any required disclosure as soon as possible. Although we put in place appropriate confidentiality provisions with our external advisers, consultants and contractors to whom we may disclose Confidential Information, we accept no liability for breaches of confidentiality by third parties.