PRIVACY NOTICE

THE TRUE COLOURS TRUST

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THE TRUE COLOURS TRUST

INTRODUCTION

The True Colours Trust ("True Colours/we/us/our") is a small independent funder working in the UK and Africa. Our work is focussed on:

- improving access to pain relief and palliative care in Africa
- improving access to palliative care for children and babies in the UK
- enabling disabled children to live their lives to the full.

Our approach recognises the importance of:

- long-term commitments
- listening to those with personal experience
- partnerships, feedback and real collaboration.

We have been working on these issues since 2002. We are working towards a time when everyone, wherever they are and whatever their age, is able to access good palliative care and disabled children are able to live their lives to the full.

True Colours is one of 16 different independent, grant-making trusts established by members of five generations of the Sainsbury family. We share offices located at The Peak, 5 Wilton Road, London SW1V 1AP which are operated by the Sainsbury Family Charitable Trusts.

Keeping your personal information safe is very important to us. We are registered as a data controller with the Information Commissioner's Office. Our registration number is Z9561157. True Colours is committed to the protection of your personal data we process in line with the data protection principles set out in the UK General Data Protection Regulation ("UK GDPR") the Data Protection Act (2018) and the Data Protection (Use and Access) Act 2025.

We have policies, procedures, and training in place to help our employees understand their data protection responsibilities and our data protection principles.

We have a nominated member of staff who serves as our Data Protection Manager. If you have any questions regarding how we collect, store and process your personal data, please email dataprotection@sfct.org.uk. We have also appointed an independent Data Protection Officer at data protection consultants, Evalian Limited who can be contacted by email at dpo@evalian.co.uk.

This privacy notice explains what personal data we collect from individuals who visit our offices or contact us by email, phone, or apply for a grant or send us other communications ("you/your").

We place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. True Colours is committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

If you have applied for a job with us or another trust or submitted your CV (or similar employment information) to us, we process your personal data as set out in our privacy notice for recruitment candidates.

Please note that we do not use any form of automated decision making or AI driven profiling when processing your personal data.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices or other services we offer. When changes are made, we will update the date at the bottom of this document. Please review this privacy notice periodically to check for updates.

WHAT INFORMATION DO WE PROCESS?

Information you provide to us

We process all information you give us, either through corresponding with us by post, telephone, email or otherwise. This includes information you provide when your register your

details with us, apply for a grant, sign up to receive news and updates or other services, participate in events, meetings and presentations, or attend social functions linked to our trust.

Whilst we provide grants to charities that support children we do not intentionally collect data about children.

Information processed following an enquiry from you or when you submit a grant application to us

We may process the following information:

- Your name (first and last)
- Organisation name
- Organisation or personal address
- Your job title
- Organisation or personal telephone number
- Organisation or personal email address

We use your name, organisation address, business email address and business phone number to respond to your enquiry and/or process your grant application.

During the course of our relationship with you, you may disclose to us, though we do not request, details about your gender, nationality, date of birth, medical conditions, a copy of your CV or a photograph.

Information processed by us when you participate in one of our parent advisory groups

We process the following information:

- Your name (first and last)
- Telephone number
- Email address
- Details about your family's experience of children's palliative care and bereavement support, this may include dates of birth and medical conditions

Information we obtain from other sources

Indirectly, we may record or receive additional details about you from:

- Public information sources, such as your organisation's website, Facebook page, Twitter account, Instagram page, Bluesky account, LinkedIn page, or from news articles and public registers, such as The Charity Commission.
- People who think that you may be interested in applying for a grant.
- External sources such as publications and works, and clinical trials, external reviewers or advisors when you apply for or are awarded a grant from us.

Cookies & CCTV

When you visit our website, we may store some information on your computer. This information will be in the form of a 'cookie' or similar file and can help us in many ways. For example, cookies allow us to tailor a website to better match your interests and preferences. With most internet browsers you can erase cookies from your computer hard drive, block all cookies or receive a warning before a cookie is stored.

We use Google Analytics 4, to help us monitor the use of our website and improve the user experience. This is to ensure that the service is available when you want it and is fast. The following cookies are set by Google Analytics 4:

Cookie Name	Expiration Time	Description
_ga_*	1 year 1 month 4 days	Google Analytics sets this cookie to store and count page views.
_ga	1 year 1 month 4 days	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.

For further details on the cookies set by Google Analytics, please refer to the Google Analytics 4 documentation.

Further information on how to prevent cookies from being stored on your computer can be found on All about cookies website under the 'manage cookies' section.

To ensure the safety of all our visitors, contractors and staff, we and the Landlord's property managers capture and record CCTV images at our reception and main entrance to the office building.

PURPOSES AND BASES FOR PROCESSING YOUR DATA

We will only use your personal information for the purpose which it was provided to us for and in ways that you would reasonably expect. We may use your data for the following purposes and on the following lawful bases:

Purpose	**Lawful Bases for Processing**
Responding to correspondence from you or other type of enquiry.	It is in our legitimate interest to respond to enquiries made by phone, by email, through our social channels or any other means.
For assessing the suitability of the grant application.	When you submit a grant application to us we are processing it with your consent.
Sending you information such as newsletters, research reports, insights and other news about True Colours and information which may be of interest.	When you agree to be contacted for communications we will rely on your consent, which may be withdrawn at any time by emailing dataprotection@sfct.org.uk.
Fulfilment of our obligations, as set out in our grant awards, or other agreements.	This is necessary for the performance of the grant award or other agreement we have entered with you.
For charitable trust / fund management, forecasting and statistical purposes.	It is our legitimate interest to identify areas for improving charitable relationships, developing new award opportunities and managing the charitable trust.
Processing relevant personal information about trustees and committee members of	It is our legal obligation to comply with governance requirements of the Charities

the grant recipients / award beneficiaries for governance purposes.	Act 2011, Charities (Protection and Social Investment) Act 2016, the Trustees Acts 1925, 2000.
Publicising the positive impact of the trust by publishing case studies.	Publication of your details, including photographs and recordings in our case studies is with your consent which can be withdrawn at any time.
Publishing our annual reports, which may contain grant award case studies.	Publication of your details in our case studies is with your consent which can be withdrawn at any time. For regulatory reporting purposes the lawful basis is legal obligation and/or public interest.
Invitation and attendance at our events.	It is our legitimate interest to publicise and celebrate the work of the trust by holding charitable events. If you attend the event we will collect and use your dietary information with your consent. If you attend the event we may collect and use photographs and recordings with your consent.
For website analytics and improvement	To help us understand how visitors use our site and to improve performance and user experience. The lawful basis is recognised legitimate interest (network security, service improvement).

SHARING YOUR INFORMATION

We will not sell or exchange your personal information. We will only share your personal information where we are required to fulfil our grant award agreement with you, or legitimate

interest, where we have your consent, or we are required to do so by law. True Colours works closely with other Sainsbury Family Charitable Trusts and may share personal details with the other trustees and trust staff, but only if it helps support your needs.

We may share your personal information with third party organisations who will process it on our behalf. This is strictly governed by data processing terms which confirms that the personal information we provide will only be used for the purposes we specify and will be processed in line with data protection legislation.

Other third parties we may share your personal data with include:

- African Palliative Care Association (APCA) who administer our small grants programme on our behalf in Africa. The information shared will be limited to only that necessary to support the Africa small grants programme.
- Other charitable organisations with whom we jointly fund projects.
- Public bodies such as the Charity Commission for England & Wales, HM Revenue & Customs, or the police. The legal basis in these cases is compliance with our legal obligations.
- In case of an emergency we may also share your information with the relevant public health and emergency services and contact your next of kin. The legal basis for processing in such cases is to protect your vital interests.

We are committed to transparency and publish a report annually about the trust's activities, Where appropriate we publicise a list of our grants on the 360 Giving website (https://www.threesixtygiving.org/). Our annual reports do not contain personal data but may contain case studies about the grants awarded.

INTERNATIONAL TRANSFERS

True Colours operates primarily in the UK, but also provides grant awards to organisations in Africa, primarily Sub-Saharan Africa. All grant application processing and award administration takes place in the UK other than applications managed by ACPA for running the small grants programme in Africa.

True Colours works with several advisers and suppliers and it is possible that we will share your data with other third-party suppliers that process your data in countries outside the UK where the data protection laws are not equivalent to those within the UK. Where this applies, we do so, either on the basis of an 'adequacy decision' or documented in an International Data Transfer Agreement approved by the by the UK's Information Commissioner's Office (ICO) which contractually oblige companies in those countries to adhere to the standard expected within the UK. More information about these is available here.

YOUR RIGHTS

The UK GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (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 rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request personal data provided by you to be transferred in machine-readable format ("data portability").
- Request erasure of 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 personal data where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of True Colours.

These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the laws and regulations to which we are subject. Under

the DUAA, we may pause the response deadline if we need clarification from you to process your request.

If you make a request, we will use reasonable and proportionate searches of our systems for your personal data and will endeavour to respond within one month of your request.

If at any time you decide that you no longer wish to be contacted for communication purposes, or if you would like to exercise any of your rights as set out above, you can contact us by email. See ‘Contact Us’.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Please note that you have the right to make a complaint at any time to the Information Commissioner’s Office if you are concerned about the way in which we are handling your personal data.

DATA RETENTION PERIOD

We will retain your personal data for as long as it necessary for the purpose of our relationship or until you object to us processing it or withdraw your consent. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance or audit purposes.

HOW TO CONTACT US OR MAKE A COMPLAINT

You can contact True Colours in relation to data protection and this privacy notice by writing to:

Data Protection Manager
The True Colours Trust
The Peak,
5 Wilton Road,
London SW1V 1AP

Alternatively, you can email us at dataprotection@sfct.org.uk

Please note that you have the right to make a complaint at any time to the Information Commissioner's Office if you are concerned about the way in which we are handling your personal data.

Last updated: May 2026