



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, grant holders, 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.

Information on how we collect, store and use personal information in connection with Wellcome Collection, when you visit our offices and websites, participate in Wellcome events, subscribe to our e-newsletter and updates or apply for a Wellcome job, is set out in our main Wellcome Privacy Statement.

We will only use personal information when the law allows us to. It is important that you read this Privacy Statement so that you are aware of how and why we are using your information.

We will make changes to this Statement where required, so please check from time to time for any updates. For ease of reference, we have organised this Statement into the following click-through sections.

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1. Who we are

In this Privacy Statement, “**Wellcome**”, “**we**”, or “**our**” means

- The Wellcome Trust Limited, who are a charitable company registered in England and Wales (company number 2711000) (as trustee of the Wellcome Trust (a registered charity with number 210183)).

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.

2. What personal information we collect and how we use it

Your personal data, or personal information, is any information about you from which you can be identified directly or indirectly. 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.

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

We collect the following information about you directly 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;

Where necessary, we 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. Europe PMC. We 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](#) for Wellcome funding;
- understanding your proposed application;
- corresponding with you to advise you on your proposed application.

(b) When you are applying for a Wellcome grant

We collect the following information about you as a lead applicant or participant (e.g. co-investigator, sponsor, supervisor, collaborator), when you apply for a grant, including via our grants systems.

- 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: [How we use diversity monitoring information](#) below).

Where necessary, we 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. Europe PMC. Where necessary, we also collect information about you (including opinions about your application) from external reviewers and advisors (e.g. peer reviewers and committee members).

We use your information for:

- setting up and administering your user account on our grants systems (providing you with a username and password) so that you can submit your application. If you have a problem using one of our funding systems we may need to access your account to solve the issue.
- 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 application and grants systems (including troubleshooting, testing, system maintenance and support);
- monitoring and reporting purposes e.g. award rates and trends in application decisions;
- 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 also use your information in the development of software tools that enable us to analyse what we are funding
- **With your consent**, we also publish on our website funding application information for certain schemes (i.e. your project title, name and details of your proposal plus a short summary of whether or not you have been awarded Wellcome funding).
- evaluating and reporting purposes (where it could be combined with other data) e.g. the fairness and efficiency of application decisions. For evaluation purposes, where necessary, we invite you to provide feedback on your experience of applying for Wellcome funding and how we might improve the way we do things

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

Where necessary, we 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 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
- 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: [How we use diversity monitoring information](#) below).

Where necessary, we 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. Europe PMC. We also collect information about you from external reviewers and advisors e.g. committee members.

We use your information for:

- administering and managing your grant;
- setting up and administering you or your organisation's user account on Wellcome Trust Grant Systems 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 Wellcome Trust Grant systems, administering the grants system (including troubleshooting, testing, system maintenance and support);
- keeping in touch with you about your grant. This includes sending you update emails to share information relevant to your grant (e.g. grant condition changes, Wellcome policy and position statement updates); and
- contacting you for feedback and suggestions for improvements on the way we do things that would benefit you as a Wellcome grantholder
- 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 also use your information in the development of software tools that enable us to analyse what we are funding.
- to publish information, such as grantholder name and application title on our corporate website, and external websites such as 360 Giving, Europe PMC and ORCID.
- **With your consent, we also publish on our website** funding application information for certain schemes (i.e. your project title, name and details of your proposal plus a short summary of whether or not you have been awarded Wellcome funding).

(d) Where you are a staff member employed through a Wellcome-funded grant

We may collect the following information about you through annual progress or end of grant reports:

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

Where necessary, 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. Europe PMC.

Where necessary, we also collect the following additional information from you:

- when you register to attend a Wellcome-hosted event for researchers. Where necessary, we ask for your name, email address, and contract start- and end-date.

We use your information:

- to better understand the research workforce we support through our grants and their research careers;
- to contact you to ask you to complete an anonymous diversity monitoring questionnaire, to understand the diversity of those working on Wellcome-funded grants; and
- to invite you to attend or participate in meetings run by Wellcome or that Wellcome is involved in which are of relevance to your grant, e.g. Fellow's meetings
- for monitoring and reporting purposes
- for evaluating and reporting purposes (where it could be combined with other data); and
- for 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.

(e) External reviewer opportunities

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. Europe PMC:

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

We may 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

(f) Where you are a peer reviewer

We collect the following information about you directly, and 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. Europe PMC:

- name and email address;
- organisation;
- area of expertise;
- diversity information (including date of birth, gender, ethnicity and if you have a disability)

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 Wellcome Trust Grant Systems;
- 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;
- contact you for feedback and suggestions for improvements on the way we do things that would benefit you as a peer reviewer;
- 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;

- 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
- [conduct diversity monitoring to better understand how we make equitable funding decisions](#)

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

We collect the following information from you some of which we are likely to hold already if you have previously interacted with Wellcome Trust Grant Systems:

- 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 also collect the following information for diversity monitoring purposes (see [How we use diversity monitoring information](#) 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. Europe PMC.

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 Wellcome Trust Grant Systems account for you);
- correspond with you about committee meetings and proceedings;
- assess any potential conflicts of interest;
- as a user of Wellcome Trust Grant Systems, administer the grants system (including troubleshooting, testing, system maintenance and support);
- contact you for feedback and suggestions for improvements on the way we do things that would benefit you as a committee member;
- monitoring and reporting purposes e.g. trends in gender of committee members in different funding streams;
- conduct diversity monitoring to better understand how we make equitable funding decisions
- 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, efficiency and impact of our funding and the research we fund.

(h)Where you agree to hear more from us

Where you have given us your opt-in consent via Wellcome Trust Grant Systems, we may also contact you about other Wellcome activities and events that may be of interest such as informing you about other funding opportunities, Wellcome events (including events at Wellcome Collection), other relevant funding opportunities and non-commercial events from external partners.

You can opt out at any time by changing your options in the Wellcome Grants Portal, or clicking unsubscribe on one of our communications.

For this purpose, we share your information with our third-party service providers to contact you and register you for events and activities. See [How we share your information](#) for further details on how your information is shared.

(i) Where you are a participant on a Wellcome grant: investigations into misconduct or change of status

Wellcome is committed to working with organisations to ensure high standards of research integrity and practice in the research it funds.

In accordance with our [Research misconduct policy](#), when an organisation submits a grant application to us, they must confirm that the lead applicant (and sponsor and supervisor if relevant), has not had an allegation of research misconduct upheld against them for which there is either a current formal disciplinary warning or an active sanction.

Wellcome-funded organisations are also 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 may use this information about you for this purpose if you are a grant participant, including where you are a:

- grantholder
- co-investigator
- sponsor or supervisor
- research staff
- students
- fieldworker
- collaborator
- consultants
- sub-awardee
- advisory committee member

We may collect the following information about you

- name
- information about your grant/grant application
- your role on the grant
- if the allegation was upheld
- the findings of the investigation
- if any sanctions are being imposed

We may use this information to:

- make sure the outcomes of Wellcome-funded grant activities are not at risk
- ensure that grantholders and participants involved in Wellcome funding receive the support they need
- monitor that complaints are being dealt with appropriately and in a timely manner
- make sure that grantholders receive the support they need, and
- be aware of the potential impact on Wellcome-funded activities and the steps being taken to manage that impact.
- reduce risk to the project and/or
- reduce the impact on other people who would be involved in the project

(j) Where you are a participant on a Wellcome grant: investigations into bullying, harassment, abuse or harm

Wellcome expects the research it funds to be carried out in a way that minimises the risk of harm to all those involved or who come into contact with it.

In accordance with our [Bullying, harassment, abuse and harm policy](#) when an organisation submits an application to us, they must confirm that the lead applicant (and sponsor and supervisor if relevant), has not had an allegation of bullying, harassment, abuse or harm of any kind upheld against them for which

there is either a current formal disciplinary warning or an active sanction. Where an organisation is in receipt of funding, they must also inform Wellcome when a formal investigation has been opened into a bullying, harassment, abuse or harm allegation.

We may collect this information from organisations that we fund, and employ you directly. Members of the public can also report a concern about Wellcome funded research.

We may use this information about you for this purpose if you are a grant participant, including where you are a:

- grantholder
- co-investigator
- sponsor or supervisor
- research staff
- students
- fieldworker
- collaborator
- consultants
- sub-awardee
- advisory committee member

We may collect the following information about you

- name
- information about your grant/ grant application
- your role on the grant
- any allegations of bullying, harassment, abuse or harm of any kind upheld at point of application against you for which there is either a current formal disciplinary warning or an active sanction
- any allegations of bullying, harassment, abuse or harm of any kind that are under investigation whilst you are a grant recipient

We may use this information to:

- make responsible funding decisions where live sanctions are in place
- to check that such claims are investigated appropriately
- monitor that complaints are being dealt with appropriately and in a timely manner
- ensure that grantholders and participants involved in Wellcome funding receive the support they need
- ensure that appropriate sanctions are applied where claims are upheld
- depending on the seriousness of the case, apply our own sanctions to individuals and organisations where cases are upheld by the employer
- be aware of the potential impact on Wellcome-funded activities and the steps being taken to manage that impact.
- manage ongoing applications where there has been a change (including a temporary change) of personnel due to ongoing or concluded investigations
- make any necessary onward report required by our regulator (the Charity Commission for England and Wales and other relevant bodies as required by law.

3. How we use particularly sensitive personal 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.

If we wish to collect and use other "special category" sensitive information about you, 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.

How we use diversity monitoring information

What is diversity monitoring?

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.

How does Wellcome collect information for diversity monitoring?

We will only collect diversity monitoring information on a named basis with your consent (which can be withdrawn at any time through our Grants Systems Portal).

With your permission, we collect the following diversity monitoring information from if you have a Wellcome Trust Grant Systems account:

- your date of birth;
- gender
- ethnicity and race; and
- disability

We will only use this information about you with your consent. If you choose not to supply this information for this purpose, it will not affect your grant application.

How does Wellcome use information to conduct diversity monitoring?

We use diversity monitoring information to:

- better understand the research workforce we support through our grants by obtaining an overview of Wellcome's grant funding profile;
- monitor the diversity of successful and unsuccessful grant applicants at each decision-making point;
- benchmark ourselves against other funders, and national and international statistics;
- ensure the diversity of those involved in our advisory committees; and
- set meaningful targets and measure progress.

We will cross-reference the diversity monitoring information that we collect with other personal information we hold about Grant Systems account holders. The type of information that will be used for cross-referencing includes success rates for application, size of award, and grant type. By cross-referencing the data in this way this will:

- help us 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;
- enable our Culture, Equity, Diversity and inclusion Team, and other teams within Wellcome, to concentrate on developing tailored solutions and making relevant changes to respond to identified challenges, rather than using guesswork or assumptions; and
- enable us to set meaningful targets and monitor and evaluate the progress of Wellcome's diversity and inclusion work (at an aggregated level), as required annually by Wellcome's Executive Leadership Team.

Sharing your diversity monitoring information with others

- where we provide funding in partnership with other organisations (funding partners) we will share your diversity monitoring data with those organisations to enable them to better understand the research workforce they co-fund with Wellcome; and

- where we work with other organisations to better understand our grant-making and funding in relation to diversity, we will share your diversity monitoring information with those organisations for this purpose.

Your information will generally be shared on a no-names basis but there may be occasions where you will be identified from the diversity information we share.

See [How we share your information](#) for further details on how your information is shared.

Your consent and how to withdraw your consent

If you change your mind, you can withdraw your consent at any time by changing your preferences in the grant portal. We will stop using your information within a reasonable period of you withdrawing your consent.

4. Our legal basis for processing

Data protection laws mean that each use we make of personal information must have a “legal basis”. The relevant legal bases are set out in UK data protection legislation.

We only use your personal data where the law allows us to. We have set out below the legal basis on which we collect, use, share or otherwise process your personal data. 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](#).

Consent

Consent is where we ask you if we can use your information in a certain way, and you agree to this. We use consent as a legal basis where:

- you have given us your consent to use the diversity monitoring information you provide to us
- you have given us your consent to you marketing communications to keep you up to date with funding opportunities and what we’re doing
- you have given us consent to publish on our website funding application information for certain schemes (i.e. your project title, name and details of your proposal plus a short summary of whether or not you have been awarded Wellcome funding).

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 Wellcome Trust Grant Systems, logging into your Wellcome Trust Grant 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 Wellcome Trust Grant portal account and unticking the relevant box under the ‘manage my details’ section
- In all other cases, by contacting our Data Protection Officer

Legitimate Interests

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their “legitimate interests” (provided that what the information is used for is fair and does not unduly impact your rights). This includes a lot of our day to day activities related to grant funding, including:

- to provide advice and support for those seeking Wellcome funding
- to provide funding
- to understand what Wellcome funds and how we fund it.
- to ensure that applications for Wellcome funding are peer reviewed and appraised by subject matter experts
- to ensure that appropriate funding decisions are made

- to ensure that awarded funds are applied for their approved purposes in accordance with our grant conditions
- to ensure that grantholders receive the support they require from Wellcome
- to ensure that Wellcome-funded grant activities achieve their outcomes
- to ensure that claims of research misconduct are investigated properly
- to ensure that claims of bullying, harassment, abuse and wider harms are investigated appropriately, ensure that appropriate sanctions are applied where claims are upheld, and to manage ongoing applications where investigations are underway

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others') interests in us using your information in this way. For more information about how we balance our legitimate interests with your interests as an individual, please contact our [Data Protection Officer](#).

Performance of a contract / take steps at your request to prepare for entry into a contract

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be using your information to provide you with funding, and sharing your information with peer reviewers before we offer you funding.

Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance, where there is a risk to the safety of others.

Archiving in the public interest

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. More information can be found [here](#).

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, and who with

Where necessary, we may share your personal data with the parties set out below who are connected to or working on behalf of Wellcome, some of whom may be based outside of the UK and the EEA, (in which case please see [International transfers of your information- outside of the UK and the European Economic Area \(EEA\) below](#)),

Within Wellcome

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

If you have a problem using one of our funding systems we may need to access your account to solve the issue.

Any investigations that fall within the remit of our [bullying, harassment, abuse and wider harms policy](#) and our [research misconduct policy](#) are communicated only to other Wellcome staff on a need to know, restricted access basis, where necessary. Information received by Wellcome (including on investigations that have not been concluded) will be treated in the strictest confidence.

Information

Outside Wellcome

When applying for funding, we may share your information with:

- other funding partners (e.g. NHS, Research Councils, Royal Society) for assessment, monitoring and reporting purposes under the terms of our partnership. For more information on how we share with partners, please consult your scheme page;
- other parties who may be interested in funding (including co-funding) certain Wellcome grants or schemes for the purpose of helping decide whether those parties will provide such funding;
- external consultants who are engaged by Wellcome to process applications and assess your eligibility and suitability for Wellcome funding; 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.
- 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.

As a grant recipient or a staff member employed through a Wellcome-funded grant, we may share your information with:

- funding partners e.g. the UK Research Councils, World Health Organisation, Royal Society, for processing, assessing, awarding and managing grants where we fund a scheme in partnership;
- other partners/third parties such as universities and research institutes for the purposes of monitoring, evaluation, research and learning;
- 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); for the purpose of reviewing, monitoring or evaluating your grant.
- partner organisations with whom Wellcome holds events (where you register to attend an event);
- third-party service providers.
- analysis of what we fund other funding partners academic and commissioned commercial researchers investigating research questions related to our funding mechanisms; and
- analysis of what we fund with academic and commercial evaluators commissioned to evaluate areas such as the effectiveness, efficiency and impact of our funding and the research we fund.
- other funding partners (e.g. UK Research Councils, Royal Society) for monitoring and reporting purposes under the terms of our partnership;
- other parties who may be interested in funding (including co-funding) certain Wellcome grants or schemes for the purpose of helping decide whether those parties will provide such funding; and
- Researchfish so that an account can be set up for you as a grantholder to enable you to report the outputs/outcomes of your research to us. For further information on the information we share with Researchfish and how this is used see: <https://www.researchfish.net/>;
- host institutions for the purpose of facilitating the collection and sharing of research outcomes/outputs data e.g. via Researchfish;
- other commercial entities within the monitoring and impact sector including Dimensions;
- 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
- where there is an allegation of bullying, harassment, abuse or harm we may share the allegation with the funded organisation, funding partner, and in rare circumstances we will

share information where requested by the police or other regulatory or governmental authority or if otherwise required by law

Where you are an external advisor or peer reviewer, we may share your information with:

- other funding partners (e.g. NHS, Research Councils, Royal Society) for assessment, 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.
- 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

Third-party service providers

We share your personal information with third-party service providers and suppliers. Some of our service providers will have access to your information to perform services on our behalf. We share your information with the following types of service providers:

- our IT and communications systems providers, and the providers of our grants systems and request tracking system (Zendesk);
- our email marketing and communications provider that distributes email publications on our behalf, where you opt-in to receive such publications;
- the provider of our web-based event registration system, to send out event invites and registration forms to those invited to Wellcome events;
- Researchfish so that an account can be set up for you as a grantholder to enable you to report the outputs/outcomes of your research to us. For further information on the information we share with Researchfish and how this is used see: <https://www.researchfish.net/>;
- event venue operators, where you are attending a Wellcome-run event, for the purpose of them administering the event;
- our travel management company, hotels and transportation providers and travel security partner (where Wellcome is organising travel associated with an event you are attending) for the purpose of making travel arrangements and sending you relevant travel alerts whilst you are travelling to/from a Wellcome event;
- third party survey providers that we use i.e. for collecting feedback on Wellcome events and collecting feedback and pre-screening information for website evaluation and research.

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.

Where otherwise required to do so

In exceptionally rare circumstances, we will share your information if required to do so under a court order, if requested by the police or other regulatory or governmental authority, if we feel there is a risk to the safety of you or others, or if otherwise required by law

For further information on how we share your information, contact 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 UK and the European Economic Area (EEA)

Where necessary, we share grant applicant personal information with external peer reviewers and external committee members, some of whom may be based outside the UK and the EEA in locations that have less stringent data protection requirements. We will only do this where it is necessary for the purpose of considering (including peer reviewing) your grant application in connection with entering into a grant funding relationship with you.

We transfer personal information we collect about you outside of the UK and the EEA where we use service providers that store information on servers based outside of the UK and the EEA. To ensure that your personal information is protected, since the data protection regimes in these locations might be less exacting than within the UK and the EEA, we ensure that one of the following safeguards is already in place, or will be put in place prior to transfer.

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

- the recipient is in a country that has been deemed to provide an adequate level of protection for personal data by the Information Commissioners Office or by adequacy regulations under the Data Protection Act 2018;
 - the recipient has entered into Binding Corporate Rules and we have conducted a Transfer Risk Assessment to be assured that information will be sufficiently protected; or
 - the recipient has entered into appropriate contractual arrangements with us and we have conducted a Transfer Risk Assessment to be assured that information will be sufficiently protected;
- or
- a derogation applies under data protection law for the specific situation

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 your diversity monitoring information where you are identified, we will cease to 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

Information related to investigations into research misconduct, bullying, harassment, abuse and wider harms

Where an allegation is not upheld, we will retain the information for no more than five years after the outcome. Where an allegation is upheld, we will retain the information for no more than ten years after the outcome, unless the sanction is still in place.

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. 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 includes information that supports the preservation of Wellcome's historical, cultural and public engagement resources and activities, and funding activities, as well as the information held in our collections that is transferred to Wellcome Collection by lenders and donors.

Further information on how we handle these collections and make them available is set out in Wellcome Collection's [Access Policy](#) and [procedures](#).

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 reserve the right to charge you a reasonable administrative fee or simply refuse to respond.

9. The UK Data Protection Regulator

Although we hope that you would never feel that you had to, you do have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office: www.ico.org.uk.

10. Contact us

If you wish to contact us in relation to this Statement, or to discuss any other matters relating to how we handle your personal data you can do so by contacting our Data Protection Officer using the following details:

Data Protection Officer
Wellcome Trust
215 Euston Road
London NW1 2BE United
Kingdom
dataprotection@wellcome.org

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

This Statement was last updated on 28th March 2023. 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 will 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 Grants System account, please update your profile on our Grants Portal if your personal data changes during your relationship with us.

