

# Privacy policy

March 2025

## Policy in brief

**The Architectural Heritage Fund** (“AHF”, “we”, “our”, “us”) is committed to protecting your privacy. This policy is intended to give you an understanding of how and why we use your personal information.

This privacy policy gives you information on how, why and when we collect your personal information when you use our website or otherwise engage with us, and how you can let us know if you would like us to change how we manage it.

We recommend that you read the full policy to understand how we process your personal information.

### 1. Who we are

The AHF works to promote the conservation and sustainable re-use of historic buildings for the benefit of communities across the UK. The AHF is a UK registered charity in England and Wales, with registered charity number 266780.

If you have questions regarding your personal information or our use of it, please contact us using the details set out in the ‘Contact’ section below.

### 2. What personal information we may hold about you

Personal information is any information that relates to an individual. Although AHF predominately holds and processes data that relates to historic building regeneration projects, we also need to process the personal information of individuals to coordinate these projects and undertake our work.

We collect the following information from you:

- Identification information such as your name;
- Contact information, such as your email address, postal address, telephone number;
- Location information such as the city in which you are based;
- Occupation and job title;
- For loan clients we collect identification for anti-money laundering purposes which may include official identification documents such as driving licences, passports or bills.
- Marketing and communications information including your preferences in terms of receiving marketing from us and your communications preferences; and
- The content of your communications or any other personal information you provide to us directly

If you contact us, for example to provide your feedback or make an enquiry, we may keep a record of that correspondence, as well as your name and contact details.

When you access our websites, we also collect information about your computer, including, where available, your IP address, operating system, and browser type. We do this for system administration purposes, including to analyse trends and gather broad demographic information for aggregate use so that we can improve the site, and deliver customised, personalised content.

#### Sensitive Personal information

Under data protection legislation, certain personal information is considered more 'sensitive' (e.g., information relating to race, religion, political affiliation and health). This is also known as 'special category data' and includes information that can be inferred about someone. Information relating to criminal offences or convictions is also sensitive. AHF collects personal information relating to criminal convictions and offences for Anti Money-Laundering and Terrorist Financing checks.

### **3. Where we obtain your personal information**

We collect and retain personal information about you in various ways, for example where you;

- Apply or pre-apply for a grant or loan or an organisation to which you are affiliated.
- Make a donation;
- Discuss leaving a bequest or legacy with us;
- Sign up to our news tracker or to receive AHF Annual Reviews;
- Attend one of our events;
- If you apply for a job or trustee role;
- Engage with us via social media platforms or use our website;

We may collect personal information about you from third parties, including:

- from publicly available and privately subscribed sources as part of our fundraising process. This may include obtaining information from individuals working on our behalf, such as our Board.

### **4. How we use your personal information**

We may use your personal information to:

- Correspond with you and undertake any administration in respect of a grant, loan or other investment application or award for your organisation;
- Meet our statutory obligations, for example, to undertake money laundering and fraud prevention checks as required under Anti-Money Laundering and Terrorist Financing regulations;
- Monitor the grants and loans we make so that we can deal with queries about project progress or any payment claims;
- Undertake long-term monitoring and evaluation of our programmes and activities. For example, we undertake Longitudinal Surveys of projects to monitor progress at 5 and 10 years after grant awards, and 10 years after loan drawdowns,
- Contact you with important information relating to an event that you've signed up to attend;
- Facilitate any transactions you wish to make with us, including donations;
- Send you updates and information about AHF and our events for example, thanking our supporters and/or donors, or sending updates if you have signed up to receive our

Newsletters or AHF Annual Reviews or other updates that we think might be of interest to you;

- Learn from your experience and feedback to develop our work; and to
- Keep our databases accurate, relevant and up to date.

## **5. Our lawful bases**

We will only use your personal information when the law allows us to (i.e., where we have a 'lawful basis'). Most commonly, we will use your personal information in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, we have a legitimate interest in delivering our services and/or processing your personal information in order to make a grant or loan to your organisation;
- Where it is necessary for the performance of a contract with you. For example, in accordance with a loan or grant agreement we have with you;
- For us to carry out a specific task in the public interest which is laid down by law; or
- Where it is necessary to comply with a legal or regulatory obligation on us (for example, reporting to HM Revenue and Customs, Companies House or the Charity Commission).

In some circumstances, we may ask for your consent to use your personal information for a specific purpose. In particular, we may obtain your consent before we send you any email marketing, newsletters or other communications about topics and events which we think might interest you.

You may unsubscribe from our email communications by following the instructions in any email that we send you, or you can withdraw your consent and request us to remove your personal information at any time by emailing us at [ahf@ahfund.org.uk](mailto:ahf@ahfund.org.uk)

Where we process sensitive personal information (for example when carrying out Anti-Money Laundering checks) we will rely on additional conditions set out in Schedule 1 to the Data Protection Act 2018 ("DPA 2018") to enable the processing of your personal information. These may include conditions which apply:

- where the processing is necessary for the purposes of complying with, or assisting other persons to comply with, a regulatory requirement<sup>1</sup> which involves taking steps to establish whether another person has been involved in dishonesty, malpractice or other seriously improper conduct (see paragraph 12 of Schedule 1 to the DPA 2018); and/or
- where the processing is necessary for the purposes of the prevention or detection of an unlawful act, including where the processing consists of the disclosure of personal data to a competent authority, or is carried out in preparation for such disclosure (see paragraph 10 of Schedule 1 to the DPA 2018).

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<sup>1</sup> A "regulatory requirement" means a requirement forming part of generally accepted principles of good practice relating to a type of body or activity.

We do not carry out any automated decision-making using personal information which produces legal effects or otherwise significantly affects individuals.

## **6. Retaining your personal information**

We will not keep personal information for longer than necessary for the purposes for which it is processed, in accordance with our internal policies and the legislative requirements. How long personal information will be stored depends on the information in question, what it is being used for and applicable statutory obligations.

The criteria we use to determine the retention period of personal information are: (i) the respective statutory retention period; (ii) our contractual and/or business relationships with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant regulators. After expiration of that period, the relevant information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract, the initiation of a contract or to protect or defend our position or that of a third party. If you have any questions about our retention periods, please contact us at [ahf@ahfund.org.uk](mailto:ahf@ahfund.org.uk).

## **7. How we may share your personal information**

We may share your personal information with third parties, including the following:

- with contractors, suppliers, or other third parties that provide services on our behalf (such as our selected consultants or website host providers);
- as part of a sale, merger or acquisition, or other transfer of all or part of our assets including as part of a bankruptcy proceeding;
- pursuant to a court order, or other legal process or as otherwise required or requested by law, regulation, or government authority programs, or to protect our rights or the rights or safety of third parties;
- with our professional advisors, lawyers, accountants and auditors; or
- with your consent or as otherwise disclosed at the time of data collection or sharing.

## **8. Your rights**

Under certain privacy laws, you have rights relating to your personal information. You may have a right to the following:

- to request access to the personal information we hold about you;
- to request that we rectify or erase your personal information;
- to request that we restrict the processing of your personal information;
- to object to our processing of your personal information in certain circumstances;
- under certain circumstances, to ask us to port personal information about you that you have provided to us to you or to a third party; and
- where we previously obtained your consent, to withdraw consent to processing your personal information.

To exercise these rights, contact us via the “Contact us” section below. Please be aware that we may be unable to provide these rights to you under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions.

Additionally, you have the right to lodge a complaint against us about how we have processed your personal information with the Information Commissioner’s Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## **9. Other websites**

Our websites contain links to other websites. Please note that when you click on one of these links, you are entering another website for which we have no responsibility (even if you access the website via a link to one of our websites). We encourage you to read the privacy notices on all such websites.

## **10. Cookies**

Our websites use cookies to enhance your experience while using those sites. Cookies are pieces of information that some websites transfer to the computer or device that is browsing that website and are used for record-keeping purposes at many websites. For further details about our use of cookies, please visit our Cookie Notice [here](#).

## **11. Accessibility**

Details are available from [our Website Accessibility Statement](#)

## **12. Changes to this policy**

We will amend this Privacy Policy from time to time – for example, to take into account changes at AHF or to reflect changes to legislation or guidance. The current version of our Privacy Policy will always be on our website.

This Privacy Policy was last updated on 18<sup>th</sup> March 2025

## **13. Contact us**

If you have any questions or concerns about this Privacy Notice or the way in which we handle your personal information, please contact:

Matthew Mckeague, CEO

Telephone: 0207 925 0199

Email: [ahf@ahfund.org.uk](mailto:ahf@ahfund.org.uk)

Our registered address:  
The Architectural Heritage Fund,  
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