

Wellcome Pilot Learning Network Privacy Policy

The Wellcome Learning Network is a pioneering global initiative designed to unlock the potential of longitudinal qualitative data to support research to improve early intervention in depression, anxiety and psychosis. It aims to address technical, methodological, and ethical barriers to generating research insights that support early intervention and improved outcomes for people living with depression, anxiety or psychosis.

Social Finance's role in this project is to design, pilot, and evaluate the Global Learning Network in close consultation with Wellcome and a group of multi-disciplinary expert advisers (Global Learning Ambassadors, GLAs). This includes designing the network model; coordinating applications, selection and onboarding of network members; coordinating network activities and support; and collating learnings from the pilot to inform future recommendations

Social Finance is committed to protecting your personal data. We want you to be familiar with how we collect, process, use and disclose your personal data. This notice (the "Privacy Policy") describes our practices in connection with any personal data we collect from you, or that you provide to us, in connection with the Wellcome Pilot Learning Network (the "Network").

By filling in the application form or by making use of any of the services listed in the "Our Services" section below, you are accepting and consenting to this Privacy Policy.

1. Important Information

Controller

Social Finance Limited is a private limited company incorporated in England and Wales with registered number 06402143 as authorised and regulated by the Financial Conduct Authority with FCA number 497568 ("Social Finance"). As the controller of your personal data, Social Finance is therefore responsible for any collection, processing, use and disclosure that may be carried out in relation to your personal data.

References to the terms "we", "us" and "our" in this Privacy Policy are to Social Finance.

Relationship with other documents

It is important that you read this Privacy Policy together with any other privacy policy update or fair processing notice that we may provide on specific occasions when we are collecting or processing personal data about you.

Updates to this Privacy Policy

This Privacy Policy may be updated from time to time. Therefore we ask that you come back every now and then to check for any updates. The “Last Updated” section at the bottom of this page indicates when this Privacy Policy was last revised. Any changes that we make to this Privacy Policy will be effective from the date specified at the bottom of the revised Privacy Policy. Your participation in the Network or use of our services following any such changes indicates that you have accepted them.

Duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. Our Services

Social Finance is an organisation that engages in projects to support public, private and social organisations (including philanthropic) in a variety of sectors to develop pioneering solutions for lasting social change. In order to provide our services, we may collect personal data through a number of sources. Please see the *‘How is your personal data collected’* section for more information.

Social Finance is supporting the design, delivery, and evaluation of the Learning Network. Where we are required by law to collect personal data, or where it is necessary to provide the relevant services or any part of them and you fail to provide such data upon request, we may not be able to perform the services necessary for participation in the Network, and your membership will be withdrawn.

How we process and use your data

“Personal data” is information that identifies an individual or relates to an identifiable individual.

We will only use your personal data when the law allows us to and we will not sell, trade or otherwise deal with your personal data in any way that contravenes this Privacy Policy (as may be updated from time to time).

We have set out below a description of the ways we plan to use your personal data, and on which legal basis we do so. Where we rely on our legitimate interests as a legal basis for processing, we have identified the nature of those legitimate interests.

Purpose/Activity	Type of Personal Data	Basis for use and processing
<ul style="list-style-type: none"> • Receive, process and evaluate applications to the Network • Selection of network members and coordination of agreements for participation in the network • Implement and coordinate Network processes, including convening meetings • Communications with actual and prospective network members • Maintain records of applicants • Conduct analysis on Network processes and performance 	<ul style="list-style-type: none"> • Name • Email address • Region/Location • Affiliation & Employment Information – Includes organisation name, employment sector (e.g. academic, healthcare, government, NGO, private sector, independent researcher) • Education and training background – includes academic qualifications, training experience, institutions attended • Primary area of expertise – professional and research background 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for providing our services, running our business, administrative purposes and making or advising on selection decisions)

We may also collect, use and share aggregated data such as statistical data for any purpose. Such may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Unless we request it, we ask that you not send us, and you not disclose, any sensitive personal data (e.g. information related to racial or ethnic origin, political opinions, or personal financial information) on or through the services or otherwise.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- complete an application form for the Network (which may be through a system operated by a third party on our behalf) or other online submission form;
- participate in networking and other events whether online or in person in the course of the Network;
- request for our products or services;
- give us some feedback.

Where necessary, we might also collect additional information about you relating to your application from external sources, including but not limited to, Wellcome, and GLAs.

Public sources. Identity data from publicly available sources such as Companies House and the Electoral Register or other equivalent sources outside the UK.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact learningnetwork@socialfinance.org.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4. Disclosures of your personal data

Social Finance will only disclose personal data in accordance with this Privacy Policy (as may be updated from time to time), the General Data Protection Regulation as applicable in the UK (UK GDPR) and other UK laws such as the Data Protection Act 2018.

We may disclose personal data to Wellcome, GLAs, and any other person that we consider necessary to facilitate the selection, implementation or conduct of the Learning Network. Applications may be shared with the GLAs and Wellcome for review and validation. Your attention is drawn to the [Wellcome Privacy Statement](#), which governs how Wellcome processes personal data.

We may disclose personal data to third party service providers (including IT system administrators, professional advisers, providers of finance, HM Revenue & Customs, regulators and other authorities) to facilitate services they provide to us.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. In such circumstances, 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.

International Transfers

If we transfer personal data to third parties outside of the UK, we will ensure your personal data is protected in accordance with applicable law, including by ensuring one or more 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. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Standard contractual clauses approved by the European Commission are in place with the transferee.

Please contact us at learningnetwork@socialfinance.org.uk if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

5. Data security

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, and service

providers 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.

We cannot guarantee the security of any personal data that you disclose online. You accept the inherent security risks of providing information online over the internet and will not hold Social Finance responsible for any breach of security unless this is due to Social Finance's negligence or wilful default.

6. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider 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 process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can request details of retention periods for specific categories of your personal data by contacting learningnetwork@socialfinance.org.uk.

7. Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal data.

Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal data in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

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

You are not usually required to pay any charge for exercising your rights. If you make a legitimate request, we will aim to respond to you within one month. Occasionally, it could take us longer to respond to you (e.g. if you have made a complex request) but we will notify you of this.

Please contact us at learningnetwork@socialfinance.org.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us at learningnetwork@socialfinance.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

ICO website: <https://www.ico.org.uk>

Helpline number: 0303 123 1113

Last Updated

We keep this privacy policy under regular review. This version was last updated on 26 February 2025.