GUILD of St GEORGE



### **Personal Privacy and Data Protection Policy**

#### 1. Background

The Guild is committed to protecting the privacy and security of any personal information it holds. This policy statement describes how we collect and use personal information in accordance with General Data Protection Regulations (GDPR) and the Data Protection Act.

#### 2. Legal Framework

### The Guild will:

- 1. Follow the Code of Practices, recommendations and guidance produced by the Information Commissioner, as the UK's supervisory body, and the European Union Data Protection Board, to process personal data in line with the legislation
- 2. Write and publish an appropriate privacy notice to make it clear what personal data we need to process, the reasons why, whether collecting the data is optional or not, and what we intend to do with the data.
- 3. Tell people if we have to share their personal data with other 3rd parties to deliver a service and, if necessary, record if consent is needed and has been given, refused or withdrawn
- 4. Inform people of their rights to request access to the personal data we hold about them, and their rights to ask for their data to be corrected or deleted or the processing restricted, and to act upon those requests promptly and within the agreed timescales.
- 5. Only collect the personal data we need, the minimum necessary.
- 6. Only use personal data for the purposes for which it was collected, unless it can be used without contravening the law
- 7. Take all reasonable steps to secure the personal data being processed and to apply controls to support access on a need-to-know basis.
- 8. Retain personal data for only as long as we need to and to delete or destroy personal data in a timely and secure manner
- Log and investigate all reported personal data breaches and to notify the Information Commissioner within the statutory timescales and the affected data subjects accordingly in line with the Guild's Information Security Incident Standard Operating Procedure.

### 3. The Companionship

If you are a Companion of the Guild, we will ask you to share the following information with us - your:

Name

- Address
- Phone contact details
- Email address
- Ruskinian interests
- General cultural interests
- Professional/occupational skills

We hold such information on a secure database. Access is restricted to Guild staff and directors but data may be made available to Companions who wish to develop special interest networks provided the appropriate permissions are sought and granted.

### 4. Partner Data

The Guild, through the projects, exhibitions and events (both online and physical) it organises, actively seeks to connect people from diverse backgrounds in an international context.

Much of the Guild's work is delivered in partnership with organisations with parallel or complementary interests or objectives. The Guild holds data on key contacts within such organisations. Such organisations include:

- Other charities and trusts
- Museums and galleries
- Social enterprises
- Cultural organisations
- Heritage organisations

### 5. Professional and Commercial Data

The Guild is a registered charity and company and as such has legal responsibilities to discharge. In doing so we engage with a range of professional agencies and hold personal contact data about contacts within them. Such businesses comprise:

- Publishers
- Designers
- Web and media specialists
- Accountants/auditors
- Solicitors
- Property management agents and surveyors
- Other contractors

### 6. Tenancies Data

The Guild has tenancies in Worcestershire and Hertfordshire. We hold financial and personal information about tenants and will share these details with accredited property management agents (who have their own privacy policies). If you are a tenant of the Guild, be assured that neither we nor our agents will share this information with other

parties and will only pass contact details on to contractors with your permission if access is required to carry out repairs or improvements works to your property to ensure your safety and comfort.

# 7. General Data

In the course of delivering our charitable objectives, we will also hold, for a period of time data about:

- people who loan or donate objects and items to the Collection
- Volunteers who are engaged with our work so we can get in touch with a carer in case of emergency (the Guild has a separate safeguarding policy to cover young and vulnerable people).
- People who book onto our events (which may be physical or online.) We hold this so we can contact you regarding the event or session, to seek feedback or to make you aware of forthcoming events
- We also hold information from people who have given consent to photographed. We hold this so that we can ask permission should we wish to use it for publicity purposes.

We hold data on who follows us on Twitter, Facebook and Instagram. Those of you who follow our Facebook page will receive invitations via Facebook to events.

# 8. How we use the data we collect

We may use your information for a number of purposes, including:

- To process bookings for events
- To process online purchases
- To process donations (gift aid and non-gift aid)
- To send you information about The Guild
- To send you survey invitations and feedback about our performance
- To contact you about employment or volunteering opportunities with us

### 9. Data Sharing

The Guild will not sell, distribute or release personal information to third parties unless we have your permission or are required by law to do so. Should you need to contact another Companion or associate, we are happy to ask that Companion for permission to pass on their details on to you.

We use a bulk email distributor, Mailchimp, for our e-newsletter and emails. When you subscribe to our emails your details are held securely by Mailchimp, who will not share your information with any third parties or contact you directly at any time. Their full Privacy Policy is available here: <u>Mailchimp's Privacy Policy</u>

We use PayPal for processing donations and purchases made through the Guild's website, The information received by us is only that needed to process your order and

does not include any personal financial information such as credit card numbers or bank account details. Purchases are processed securely by PayPal and information submitted during checkout conforms to their own Privacy Policy available to read here: <u>https://www.paypal.com/uk/webapps/mpp/ua/privacy-full</u>

# 10. Storing Your Data

We take all reasonable steps to ensure your data is kept secure. We hold personal data in electronic and paper form. We will keep your information only for as long as we need it to provide you with the goods, services or information you have requested, to administer your contract with us, or if we are required to for legal / financial reasons. Electronic information is stored on an encrypted server, which is password protected. No third party can access any data on the server or email server without our permission. All areas that contain any data are password protected. Staff and volunteers are contractually required to keep personal data safe and are given training in Data Protection.

# 11. How long do we keep your data?

Principle 5 of the Data Protection Act 1998 states that data should be retained "no longer than necessary for the purpose you obtained it". We will keep your information only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal obligations. We will not keep more information than we need or for longer than we need. We will completely remove your data from our database at any time if you request it. We will take steps to ensure personal data stored is up to date and accurate.

If you are a Companion of the Guild, we will hold your name, address, and email for the purposes of contacting you and ensuring you receive the Guild's communications and AGM papers. This information is held on a secure database and is never shared with any third party, nor is it shared with other Companions without your permission. For our archive records, we will keep in perpetuity your name, when you joined the Guild and any further involvement you might have via the Guild (posts held, publications, activity, donations made.

### 12. Access to your information

You have a number of rights about the way we process your data. These are:

- Where our use of your data requires consent, you may withdraw this consent at any time.
- Where we rely on our legitimate interest to process data, you may ask us to stop doing so.
- You may request a copy of the data we hold about you.
- If we are carrying out Companion profiling, you may ask us not to do so.
- You may change or stop the way in which we communicate with you or process data about you, and if it is not required for the purpose, you provided it, then we will do so. Activities like processing Gift Aid donations, or holding a collection item that you have loaned or given us may mean we cannot entirely stop

processing your data, but we will always endeavour to comply with such a request.

You also have the right to make a complaint direct to the UK's data protection authority, the Information Commissioner's Office (ICO). The ICO can be contacted at: <u>https://ico.org.uk/global/contact-us/.</u>

If you would like a copy of some or all of your personal information, please contact the Membership & Communications Officer at communications@guildofstgeorge.org.uk

# 13. Reporting a Breach of Your Data to the Information Commissioner's Office [ICO]

In the extremely unlikely event that we accidently send your personal contact details to the wrong recipient, and if this breach of your data is deemed to be a severe risk to your rights and freedoms as a data subject, you will be informed and your case will be reported to the ICO, who have measures in place to take the case further. Please be reassured that given the limited amount of data we hold on you, that an incident of this severity is very unlikely to occur, but we have measures in place as part of our compliance with GDPR.

### 14. Changes to our Privacy Policy

We regularly review this Privacy Notice. The latest version will be available on our website <u>www.guildofstgeorge.org.uk</u>. This policy was last updated on:

1 August 2021