

ROYAL GREENWICH HERITAGE TRUST PRIVACY POLICY

The Royal Greenwich Heritage Trust (the “Trust”, “we”, “us”, “our”) is committing to protecting and respecting your privacy. This Privacy Policy (“Policy”) explains when and why we collect your personal information, how and why we use it, and your rights and options.

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how and why we use your personal information.

The provision of your personal information to us is voluntary. However, without providing us with your personal information, your use of our services or your interaction with us may be impaired. For example, we may be unable to answer your questions about the region.

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1. Who we are

The Trust, a limited company and registered charity (charity number 1157164).

We care for important historic buildings, Charlton House, Tudor Barn and Greenwich Heritage Centre, a number of memorials in the borough, and Royal Greenwich’s museum and archive collections. We are entrusted with protecting the future of the Royal Borough’s rich heritage, whilst bringing it to life for everyone, through exhibitions, tours, walks and activities.

The aims of the Trust:

- To help people learn and find out about the history and heritage of our region.

- To care for our heritage buildings for the benefit of the public.
- To promote the use of the buildings, grounds and collections in our care.
- To achieve these aims, we will occasionally need to process your personal information. We are committed to maintaining the trust and confidence of our audiences. Here you'll find information on how we treat the personal information that we collect.

2. How do we collect your personal information?

a. When you give it to us directly

For example, personal information that you submit through our website by hiring one of our venues, making a donation or signing up for our newsletter.

b. When we obtain it indirectly

For example, your personal information may be shared with us by third parties including, for example, our business partners; sub-contractors in technical, payment and delivery services or search information providers. To the extent we have not done so already, we will notify you when we receive personal information about you from them and tell you how and why we intend to use that personal information.

c. When it is available publicly

Your personal information may be available to us from external publicly available services. For example, depending on your privacy settings for social media services, we may access information from those accounts or services when you interact with us via Facebook or Twitter.

d. When you visit our website

When you visit our website, we automatically collect the following types of personal information:

- i. Technical information, including the internet protocol (IP) address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
- ii. Information about your visit to the website, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

We also collect and use your personal information by using cookies on our website – please see our [Cookie Policy \(coming soon\)](#).

In general, we may combine your personal information from these different sources for the purposes set out in this Policy.

3. What types of personal information do we use?

We may collect, store and otherwise use the following kinds of personal information:

- your name and contact details (email address, telephone number and/or postal address)

- your social media identity
- your financial information, such as bank details and/or credit/debit card details, account holder name, sort code and account number
- your tax information
- physical descriptions
- photographs and videos
- information about your computer/mobile device and your visits to and use of our website including, for example, your IP address and geographical location
- information about our services which you use/which we consider may be of interest to you
- details relating to property which you have donated
- any other personal information which we obtain as per section 2 of this Policy.

Do we process special categories of your personal information?

The EU General Data Protection Regulation (“GDPR”) recognises certain categories of personal information as sensitive and therefore requiring more protection, for example information about individuals’ health, ethnicity and religious beliefs.

In certain situations, the Trust may collect and/or use these special categories of your personal information (for example, to ensure equal access to our venues for hire based on medical conditions of visitors). We will only process these special categories of your personal information if there is a valid reason for doing so and where the GDPR allows us to do so.

Events and Activities

We may occasionally invite you to complete a visitor survey. This helps us to understand more about our audiences. Personal Data collected may include:

- Your postcode, so we know where people are visiting us from
- Personal interests, to help us plan our events programmes and our future exhibition programmes
- Where you found out about us, to help us better target our advertising and marketing.

We will not use this data to contact you and we will not share your surveys with anyone else.

4. How and why will we use your personal information?

Your personal information, however provided to us, will be used for the purposes specified in this Policy. In particular, we may use your personal information to:

- allow you to hire our venues
- process your donations
- claim Gift Aid on your donations
- provide you with a guided tour of one of our venues
- purchase tickets to our events
- carry out our obligations arising from any contracts entered into by you and us
- allow you to visit our venues

- register as a member of the Friends of the Trust and administer that membership
- provide you with services or information which you have requested
- answer your questions and communicate with you in general
- provide further information about our work, services, activities or products (where necessary, only where you have provided your consent to receive such information)
- analyse and improve our work, services, activities, products and/or information (including our website)
- report on the impact or effectiveness of our work
- run/administer our website, keep it safe and secure and ensure that content is presented in the most effective manner for you and for your device
- conduct surveys
- audit and/or administer our accounts
- satisfy legal obligations which are binding on us, for example, relating to the payment of tax or anti-money laundering initiatives
- prevention of fraud or misuse of services
- establishment, defence and/or enforcement of legal claims.

5. Lawful bases

The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant:

- Where you have provided your consent for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you our email newsletter, and we may ask for your explicit consent to collect special categories of your personal information).
- Where necessary so that we can comply with a legal obligation to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
- Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (for example, if you hire one of our venues).
- Where it is in your/ someone else's vital interests (for example, in case of medical emergency suffered by an individual during a visit or guided tour).
- Where there is a legitimate interest in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

In broad terms, our "legitimate interests" means the interests of running the Trust as a charitable and entity and achieving our aims listed in section 1 of this Policy.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data

protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

6. Communications for marketing

We may use your contact details to provide you with information about our work, events, services and/or products which we consider may be of interest to you (for example, about services you previously used, or updates about new guided tours which are available.)

Where we do this via email, SMS or telephone, we will not do so without your prior consent (unless allowed to do so via applicable law).

Where you have provided us with your consent previously but do not wish to be contacted by us about our projects and/or services in the future, please let us know by emailing team@rght.org.uk. You can opt out of receiving emails from the Trust at any time by clicking the 'unsubscribe' link at the bottom of our emails.

7. Donations

When you use our secure online donation function you will be directed to a specialist payment services provider who will receive your financial information to process the transaction. We will provide your personal information to the payment services provider only to the extent necessary for the purpose of processing your donation.

8. Will we share your personal information?

We do not sell or rent your personal information to third parties.

However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Policy.

Those parties include, but are not limited to:

- Mailchimp, who help us to deliver our newsletter (please see [MailChimp's privacy policy](#))
- Eventbrite, who help us with ticket sales for our events (see [Eventbrite's privacy policy](#))
- Borough Photos, who help us to sell postcards in our collection (see [Borough Photos' privacy policy](#))
- Our founders and project partners, for example, Heritage Lottery Fund (see [HLF's privacy policy](#)); Royal Borough of Greenwich (see [RBG's privacy policy](#)); and Arts Council England through the London Development Team (see [ACE's cookie policy](#))
- Suppliers and sub-contractors for the performance of any contract we enter into with them, for example, IT service providers such as website hosts or cloud storage providers
- Insurers
- Banks
- Financial companies that collect or process donations on our behalf

- Professional service providers such as accountants and lawyers
- Regulatory authorities, such as tax authorities
- Analytics and search engine providers.

9. How long do we keep your personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records six years after the date it was collected. However, if before that date, (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure (please see Section 10 below), we will remove it from our records at the relevant time.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

10. Your rights and how to exercise them

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or purposes or to unsubscribe from our email list at any time. You also have the following rights:

- Right of access – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
- Right of erasure – at your request we will delete your personal information from our records as far as we are required to do so. In many cases we would propose to suppress further communications with you, rather than delete it.
- Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
- Right to restrict processing – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.
- Right to object – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests ground, (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.
- Right to data portability – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact, and in either case we are

processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.

- Rights related to automated decision-making – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal effects or similarly significantly affects you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or Member State law to which the Trust is subject (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing personal information requested to you.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you contact us using the details in section 16 below.

You are further entitled to make a complaint about us or the way we have processed your personal information to the data protection supervisory authority in your home country. In the UK, the data protection authority is the [Information Commissioner's Office](#).

For further information on how to exercise this right, please contact us using the details in section 16 below.

11. Security/storage of and access to your personal information

The Trust is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information.

Your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers with features enacted to prevent unauthorised access.

12. Links and third parties

We link our website directly to other sites. This Policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

13. Children's personal information

When we process children's personal information, where required we will not do so without their consent or, where required, the consent of a parent/guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

14. Fundraising

As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies such as Prospecting for Gold to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

We may also carry out wealth screening to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing. We may also carry out research using publically available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We also use publicly available sources to carry out due diligence on donors in line with the charity's Fundraising Policy and to meet money laundering regulations.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

If you would prefer us not to use your data in this way, please email us at info@rght.org.uk or call us on (0)20 8856 3951.

15. Transferring your personal information outside the European Economic Area

Given that we are an organisation based in the UK, we will normally only transfer your personal information within the European Economic Area ("**EEA**"), where all countries have the same level of data protection law as under the GDPR.

However, because we may sometimes use agencies and/or suppliers to process personal information on our behalf, it is possible that personal information we collect from you will be transferred to and stored in a location outside the EEA, for example the United States.

Please note that some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/or otherwise processed outside the EEA in a country that does not offer an equivalent standard of protection to the EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses which have been approved by the European Commission) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Policy. If you have any questions about the transfer of your personal information, please contact us using the details below.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure – however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorised access.

16. Updates to this Policy

We may update this Policy from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an update notice on our website.

This Policy was last updated on 30/09/2019.

17. How to contact us?

Please let us know if you have any questions about this Policy or about the way in which the Trust processes your personal information by contacting us at the following channels:

Email: info@rght.org.uk

Tel: +44 (0)20 8856 3951

Post: Royal Greenwich Heritage Trust, Charlton House, Charlton, London SE7 8RE