

## **Halsway Manor Society – Privacy Policy**

### **Purpose of Policy**

We are committed to protecting your personal information and being transparent about what information we hold about you. Using personal information allows us to develop a better understanding of our customers and in turn to provide you with relevant and timely information about the work that we do. As a charity, it also helps us to engage with potential donors and supporters. The purpose of this policy is to give you a clear explanation about how we collect and use the information collected from you directly and from third parties. We use your information in accordance with all applicable laws (including the General Data Protection Regulation (EU) 2016/679 and all related data protection legislation having effect in the United Kingdom) concerning the protection of personal information and are responsible as a 'controller' of that personal information for the purpose of those laws ('Data Protection Laws').

This policy explains:

- What information we may collect about you;
- How we may use that information;
- Our use of cookies to improve your use of our website; and
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to see it

### **Information Collection**

We collect various types of information in a number of ways.

- **Information you give us**  
Customers: For example when you book on a course, buy tickets or make a donation, we'll store personal information you give us such as your name, email address, postal address and telephone number. We will also store a record of your purchases and donations.
- **Information about your interactions with us**  
For example when you visit our website, we collect information about how you interact with our content. When we send you a mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on. This assists us to better tailor our communications to you and create an enhanced customer journey for you.

### **Legal Basis**

There are two legal basis under which we process your data:

- **Contract Purposes**  
When you make a booking or purchase from us, make a donation to us or apply to participate / volunteer in our events you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example, we may need to contact you by email or telephone in the case of the cancellation of an event, or in the case of problems with your payment.  
We will also process and store your data if you have entered into a contract as a third party (eg artists, contractors, suppliers etc).

- **Legitimate Organisational Interests**

In certain situations we collect and process your personal data for purposes that are within our legitimate organisational interests.

### **Marketing Communications**

We aim to communicate with you about the work we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as events that you have booked for in the past, as well as any preferences you may have told us about. We use our legitimate organisational interest as the legal basis for communications by post, email and telephone.

We will provide you with an option to opt-out in every email which we send to you, or you can alternatively use the contact details at the end of this policy.

### **Other processing activities**

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- To allow us to improve our services;
- We may analyze data we hold about you to ensure the content and timing of communications that we send you are as relevant and timely as possible;
- We may analyze data we hold about you in order to identify and prevent fraud;
- In order to improve our website, we may analyze information about how you use it and the content that you interact with;
- We may take photos and/or film events which you attend and use these for promotional purposes. If you do not wish to be included please notify us.

In all of the cases above we will always keep your rights and interests at the forefront. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

### **Third parties**

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our own service providers who process data on our behalf and under our instructions (for example our ticketing system (PatronBase), email marketing (MailChimp), donation/Gift Aid (Now Donate) etc). In these cases we require that these third parties comply strictly with our instructions and with Data Protection Laws, for example around security & disclosure.
- Where we are under a duty to disclose your personal information in order to comply with any regulatory or legal obligation (for example to government bodies and law enforcement agencies).

### **Cookies**

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well as to provide website operators with information on how the site is being used. We use cookies to keep track of your basket as well as to identify how the website its being used and what improvements we can make.

### **Website links**

Our website may, from time to time, contain links to and from partners', advertisers', affiliates' and social network sites. If you follow a link to any of these websites, please note that these sites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those privacy policies before you submit any personal data to those websites as their terms may not be the same as ours.

### **Maintaining your personal information**

Personal data is stored for 5 years, reviewed annually and anonymized. If we have a legitimate organisational interest in holding such data for a longer period of time (for example, if it has alumni value to us) then we will do so, but no data is kept for any longer than is reasonably necessary and always subject to the principal of data minimization.

### **Security of your personal information**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will do so only in an authorized manner and are subject to a duty of confidentiality.

We will always store your digital information on secure third party servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of your information transmitted to our website or otherwise to our servers (such as by email). Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to.

### **Your rights to your personal information**

Under the Data Protection Laws, you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and to certain other supplementary information that this Privacy Policy is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning yourself for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of these rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us - use the contact details at the end of this policy;
- let us have enough information to identify you;
- let us have a proof of your identity and address (a copy of your driving license or passport and a recent utility or credit card bill); and
- let us know the information to which your requests relates.

If you have any complaints please contact Halsway Manor.

The Data Protection Laws also give you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws has occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone; 0303 123 1113.

### **Changes to this Privacy Policy**

This privacy policy was last updated on 21 November 2019.

We may change this Privacy Policy from time to time and any material changes we make in the future will be uploaded to our website. Please check back frequently to see any updates or changes to our privacy policy.

### **How to contact us**

If you have any questions about this Privacy Policy or the information we hold about you please contact: Halsway Manor, Halsway Lane, Crowcombe, Somerset TA4 4BD. 01984 618274.  
office@halswaymanor.org.uk.