



Official address:

**The Museum  
Broad Street  
Spalding  
PE11 1TB**

## **PRIVACY POLICY**

This policy describes how and why the Spalding Gentlemen's Society (the SGS) uses your personal information, how we protect your privacy when doing so, and your rights and choices regarding this information. We promise to respect all of your personal information which is under our control and keep it safe. We aim to be clear about what we will do with your information when we collect it.

This Policy is effective from 25 May 2018.

### **About us**

The SGS is a company limited by guarantee under the Companies Act 2006 and our registration number is 543260. We are an Accredited Museum and Registered Charity and our charity registration number is 216131. We are also registered as a data controller with the Information Commissioners Office and our registration number is A8346508. Any electronic communications will be made in accordance with the Privacy and Electronic Communications Regulations (PECR).

### **Legal basis for processing**

Data protection laws mean that each use we make of personal information must have a legal basis in accordance with the Data Protection Act 1998 and the new General Data Protection Regulation (GDPR) which is effective from 25 May 2018. There are several ways in which organisations can do this depending on their relationship with various individuals. In the case of the SGS, one of these bases – Legitimate Interests – applies to Members; whilst another basis – Consent – may be more appropriate for non-members or in certain uses of members' personal information which are not already covered by the existing and the new legal requirements.

### **Why do we need a Privacy Policy?**

The Data Protection Act 1988 has been the main legal basis and guidance for the protection of personal information for many years. However, GDPR means that all organisations have had to review their policies and practices. Trustees of the Society have been working hard to make sure that the way in which we manage your personal information is fully compliant with the new requirements.

### **Members of the SGS**

Members are 'owners' of the SGS, and have a contractual relationship with us under The Companies Act 2006. Given these circumstances the SGS will rely on what the GDPR calls Legitimate Interests, which covers organisational processing of personal information that is essential for administrative, legal, security and financial management as well as for meeting our contractual relationship with you. Organisations that rely on this basis have to comply with a range of other obligations and standards and with your reasonable expectations of how your personal information is used. We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their legitimate interests, so long as it is fair

and does not unduly impact on your rights. The legitimate interests basis also applies to contractual and retail relationships.

### **Specific Consent**

Consent is where we ask you if we can use the personal information you have given us in a certain way which is not already covered by legitimate interests. This might include asking you whether you are willing for us to contact you by email (if you have not previously given us an email address) or inviting you directly to participate in certain fundraising appeals. We would need your consent in these circumstances if you could not have reasonably foreseen that your personal information would be used in this way.

### **What personal information do we collect?**

Subject to membership obligations or your specific consent in certain circumstances, we collect, store and use the following kinds of personal information where appropriate:

- your name, title and the contact details you give us (e.g. postal address, telephone number, e-mail address);
- your bank, standing order, direct debit or credit/debit card details where these options are available and where you provide these to make or receive a payment, and taxation status for relevant payments to us to enable us to claim Gift Aid;
- information we need to process any research request or placement; photographic permissions, assignment of copyright; publication requests; collection loans and donations to the SGS or other administrative tasks;
- information for contractual and business purposes; retail orders, direct purchases from us and processing as and when this service becomes available;
- membership information, which may include specific interests, professional expertise, skills and experience;
- where you have made a legacy, any information about yourself and your executor(s) which you may have given us to administer this;
- any specific needs you have told us about with regard to limited mobility or disability in respect of yourself or someone coming to the Museum with you, to enable us to meet your needs where possible; and for monitoring purposes where necessary e.g. for employees;
- age, nationality, gender and ethnicity information (for employee purposes only). Surveys may seek this information but for aggregate data only without any identification of individuals;
- if you volunteer or apply for a job with us, information necessary to process your application (which may include information such as employment status, previous experience, as well as any unspent criminal convictions or pending court cases you may have);
- information about your activities on our website and about the device you use to access these (i.e. cookies);

Certain types of personal information are in a special category under data protection laws as they are considered more sensitive. In the context of the SGS this information is not required except occasionally for employees and volunteers, in which case we would make clear why such information is needed.

### **Children and Young Persons under the age of 18 – information for parents and guardians**

Specific provisions apply to younger people and children. There is currently no membership option for anyone under the age of 18 but we do, from time to time, have younger people undertaking research into the SGS's collections, as well as school visits. We welcome engagement with younger people and children as an important opportunity to explore the significance of the Society and its historical importance.

- We will take special care to respect and protect the rights of individuals in the case of those aged 13 or under;

- We will not use the personal information of children or young persons for marketing purposes and we will not profile it;
- Personal information about children is only accessible by our members on a strictly need to know basis.

## **CCTV**

The SGS has installed CCTV in the Museum. We are registered with the Information Commissioner's Office as a requirement of this installation. CCTV cameras are in operation throughout the Museum and are used for three main purposes:

- Providing a safe and secure environment for our members, visitors and staff;
- Protecting our collections;
- Preventing and detecting crime and anti-social behaviour.

Our CCTV Policy is available on our website at <http://sgsoc.org> or you can contact us and we will send you a copy.

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

We use the personal information you give to us for a number of purposes as shown below. In addition, we may need to use your personal information to comply with a legal or financial obligation; to protect your vital interests; to carry out a task in the public interest; or for our own (or a third party's) interests, provided your rights do not override these interests.

## **Marketing**

We may use your personal information to communicate with you to promote our activities. This includes sending you information about membership and events, generalised flyers about fundraising initiatives, including legacies, and other ways you may be able to support us or benefit from the SGS.

## **Administration**

We use the personal information you have provided for administrative purposes including:

- furthering our charitable objectives;
- contractual and business to business relationships;
- maintaining information about our Members and other supporters and processing membership applications and subscriptions, including Gift Aid, and to perform our obligations under membership contracts and other supporters' agreements;
- managing collection loans and donations; providing information about news and events, including our newsletter and to communicate with you by email and correspondence;
- auditing and administering our accounts;
- responding to or fulfilling any requests, complaints or enquiries you make with us;
- understanding how we can improve our organisation, services, products or information by conducting analysis and market research and to process applications for funding;
- generating reports on our work, services and events; testing our technical systems to ensure they are working as expected; administering our website and non-digital records to troubleshoot, perform data analysis and research, generate statistics and surveys; and conducting due diligence and ethical screening;
- safeguarding our staff, members and volunteers; and to satisfy our employer responsibilities;
- registering and administering online purchases, should this facility become available;
- conducting training and quality control.

We may also use your personal information to process any other relevant information you have provided to us, as we develop the Society's digital media communications.

### **Who we might share your personal information with**

We do not disclose personal information to any third parties or external organisations other than data processors carrying out work on our behalf, for example, the sending of newsletters. We may occasionally need to transfer your personal information to countries outside the EU, for instance to a bulk email distributor such as Mailchimp. As Data Controllers the SGS Council needs to be satisfied that such data processors are compliant with UK and EU data protection law and regulations and that they act only in accordance with best practice and our instructions.

Other than for the legal and other reasons specifically mentioned in this policy, your personal information will never be sold or passed to any third party for any other purpose.

### **How we keep your information secure**

Our security procedures, rules and technical measures are designed to protect the personal information that we have under our control from unauthorised access, improper use or disclosure, and unauthorised modification. All volunteers, employees and data processors who have access to and are associated with the processing personal details are legally obliged to respect the confidentiality of all information provided.

### **How can I access the information about me or request a correction of information held?**

You have a right to ask us if we are keeping any personal information about you and also to request a copy of that information. This is called a Subject Access Request, which entitles you to know:

- whether any personal information is being processed and the source of that data;
- a description of the information, the reasons it is being processed and whether it will be shared.

To make a Subject Access Request you will need to provide adequate proof of identity such as a copy your passport, birth certificate or driving licence before your request can be processed. There is no specified fee but, depending upon the volume of work involved, a charge may be necessary to cover the administrative cost. Once we have received your Subject Access Request, any agreed charge and proof of identity, you will receive a response from us within 40 days and you will be able to get copies of any information about you that we hold. However, exemptions to disclosure may apply in some circumstances.

**Subject Access Requests should be sent to The Secretary at the address given above or to the email address below.**

**Email:** [secsgs@btconnect.com](mailto:secsgs@btconnect.com)

You have a right to request that we delete or correct your personal information. If you wish to correct any information about you held by the SGS, simply contact [info@sgsoc.org](mailto:info@sgsoc.org) or write to us at the address given above.

### **Managing your contact preferences**

We ask you how you wish us to communicate with you when you become a Member or in any other circumstances where you give us personal information. We use your contact information for administrative purposes and to keep you up to date with news and initiatives. This may include, for example, where we are processing a donation you have made, updating you with regard to your participation in an event or just keeping in touch with you about volunteering work you are doing for the SGS. You can update your contact preferences at any time by getting in touch with us.

### **Legal obligation**

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. In some cases we may need to share that information with our various regulators such as the Charity Commission, Fundraising Regulator or Information Commissioner, or to use information we collect about you for due diligence or ethical screening purposes.

### **Vital interests**

We have a basis to use your personal information where it is necessary for us to protect life or health. Examples would be an emergency impacting individuals whilst visiting the Society or at one of our events, or a need to share information with emergency services.

### **How long do we keep your personal information for?**

The law requires that organisations keep some data for specific periods of time, for instance, for taxation, Gift Aid and health and safety purposes. In other circumstances the SGS would need to ensure retention of data such as collection donations/loans, photographic and publication consents, copyright assignment and legacies for our records and archives. Data protection principles, however, encourage secure deletion and disposal of data when it is no longer needed and periodic review of the relevance of data retention.

### **Complaints**

If you are unhappy with any aspect of how we are using your personal information we would like to hear about it. We appreciate the opportunity such feedback gives us to learn and improve. You can contact us via our website, by email at [info@sgsoc.org](mailto:info@sgsoc.org), or by writing to us at the address given above. You also have a right to lodge a complaint about any use of your information with the Information Commissioners Office which is the UK data protection regulator.

### **Changes to our Privacy Policy**

This Privacy Policy will be reviewed by the SGS Council as the need for change arises. Announcements about any change will be made via our website or, where requested, another communication method such as by post or email.

### **How to contact us:**

- By email to [info@sgsoc.org](mailto:info@sgsoc.org)
- Or write to us at the Broad Street premises

We may amend this privacy policy from time to time to ensure it remains up-to-date and continues to reflect how and why we use your personal information.

This Policy was approved by the Council of the Spalding Gentlemen's Society in May 2018 and will be reviewed no later than 2021.