



BELLINGHAM HERITAGE CENTRE

DATA PRIVACY POLICY

Version 1.1 Last update 14 April 2018

1. About this Policy

1.1 This policy explains when and why we collect personal information about our Friends and Visitors, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [<http://www.bellingham-heritage.org.uk>] for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are The Heritage Centre, Bellingham. We can be contacted at The Heritage Centre, Station Yard, Woodburn Rd, Bellingham, Northumberland, NE48 2DG and info@bellingham-heritage.org.uk and 01434 220050 (when the centre is attended).

3. What information we collect and why.

Please note that in the following table where we state data may be shared with other parties, such as the Arts Council (for the purposes of Grant applications), we will only ever share anonymised data such as the number of Friends, the number of Visitors within an age range etc, where such data is required as part of the grant conditions. We will never disclose any personal details such as name, address, email address or telephone numbers.

Type of information	Purposes	Legal basis of processing
Friend's name, address, telephone numbers, e-mail address(es).	Managing the Friend's membership of the Centre. Informing Friends about events at the Centre.	Performing the Centre's contract with the Friend. For the purposes of our legitimate interests in operating the Centre.
Volunteer's name, address, telephone numbers, e-mail address(es).	Managing the Volunteer's time and effort at the Heritage Centre. Informing Volunteers about Training Courses. Informing Volunteers about events at the Centre.	Performing the Centre's relationship with the Volunteer.
Photos and videos of Friends, Volunteers or visitors (see more detailed advice below 3.3).	Putting on the Centre's website and social media pages and using in press releases.	Consent. We will seek the Friend's, Volunteer's or Visitor's consent on and they may withdraw their consent at any time by contacting us by e-mail or letter.

Type of information	Purposes	Legal basis of processing
The Friend's name and e-mail address.	<p>Creating and managing the Centre's online Membership Directory.</p> <p>Contacting Friend's with Centre news e.g. via MailChimp or similar.</p> <p>Contacting Friends' to conduct occasional surveys e.g. by SurveyMonkey or similar.</p> <p>Managing authorised use of the website via a secure login.</p> <p>Records of website usage and access for the purposes of security.</p>	<p>Consent. We will seek the Friend's consent on their membership application form and each membership renewal form. The Friend may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Friend's Directory.</p>
Trustees and Committee members name and email addresses.	<p>Managing authorised use of the website via a secure login.</p> <p>Records of website usage and access for the purposes of security.</p>	<p>For Trustees and Committee members use of a name and email address is regarded as being used for the purposes of our legitimate interests in operating the Centre.</p>
Bank account details of the Friend or other person making payment to the Centre.	<p>Managing the Friend's membership of the Centre.</p>	<p>Performing the Centre's contract with the Friend.</p>

3.3 Data relating to images. Guidance from the Information Commissioner suggests that in order for an image to amount to personal data, it must be possible to identify an individual from information within the image or text associated with the image. Being recognised by family or friends is not the same as being identified. As a result, crowd or distance shots are unlikely to amount to personal data. If it is possible to identify the individual, perhaps as

a result of additional information contained in the image, the image will be considered personal data for the purposes of data protection legislation.

For the purposes of this policy images and video will include:

1. Images of individuals at Centre organised events or training sessions.
2. A staged picture of an individual e.g. at a Centre organised event taken to use in marketing material or website or social media promotion.

It does not include a picture of a crowd of people in which the individual(s) themselves cannot be explicitly identified.

The Centre will seek consent for the use of such images as described above and where necessary seek the consent of a parent or guardian where the image involves a child. Such consent may be verbal. We will make it clear that such images become the ownership of The Heritage Centre but that the use of such image data may, like any other data, be withdrawn at any time. If such images were to be utilised on printed promotional material the withdrawal of such images will only be practical at the next print run of the printed material.

4. How we protect your personal data

4.1 We will not transfer your personal data outside the EEA.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where your information is transmitted over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we accept from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a

contract in place that requires them to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Centre and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

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

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager info@bellingham-heritage.org.uk

Change Log

Issue 1.1 14.04.18 Original Document, no changes to record.