



## Privacy Policy

At Gloucester Civic Trust, we're committed to protecting and respecting your privacy.

This Policy explains who we are and when and why we collect personal information. This may be from individuals who visit our website or from individuals who choose to engage with us another way. This Policy also explains how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes.

Any questions regarding this Policy and our privacy practices should be sent by email to [data@gloucestercivictrust.org](mailto:data@gloucestercivictrust.org) or by writing to Membership, Gloucester Civic Trust, Bishop Hooper House, 99-103 Westgate Street, Gloucester GL1 2PG

### 1) Who are we?

The Registered Office of Gloucester Civic Trust is at Bishop Hooper House in Westgate Street. We provide a varied programme of tours, mainly operated from St Michael's Tower at The Cross, and activities to bring alive the history of the city for local residents and visitors. We also seek to ensure that re-generation and future plans respect and complement Gloucester's heritage. We are a voluntary organisation and rely on our membership to help provide all the services we offer.

### 2) How do we collect information from you?

There are two ways we may collect information from you:

**Online** - When you use our website, we may collect your personal information through the 'Contact Us' form if that is how you choose to contact us.

**Offline** - If you write to us, telephone us or email us then we may retain your personal information in order to respond to your query, act on your instruction or fulfil one of our legitimate interests.

### 3) Personal Data retained by Gloucester Civic Trust

The type of personal information you provide to Gloucester Civic Trust will vary depending on why you are contacting us. We will only ever collect the minimum amount of personal information we need to achieve the aim of the processing. Examples of personal information we may collect from you include:

- > Name
- > Domestic postal address
- > Phone Number (landline and mobile)
- > Email address
- > Signature



- › Details of any events attended, and payments made.
- › Photographs of people
- › Details of any membership subscription paid.
- › Details of any donation made.
- › Details of any Gift Aid authorities given.

Members may share their dietary requirements. This is sensitive data and Gloucester Civic Trust is committed to ensuring this is protected to a high standard. This personal data is only ever collected by consent and where it is disclosed by the individual voluntarily.

Gloucester Civic Trust stores personal data either electronically or physically.

Where the data is stored electronically, this is stored “on the cloud”, and can only be accessed by employees of Gloucester Civic Trust and any other Trust members authorised by Council (the Board of Trustees of Gloucester Civic Trust). As a minimum, the data is password protected (via a login).

Membership information is retained on a secure database which is also password protected.

Where data is stored physically (this includes gift aid authorities, paper membership forms, physical attendance lists from events, correspondence), this information is retained in a secure environment.

Personal information as defined above relates to information in the following four categories:

- › Individual members and patrons
- › Corporate members (specifically relating to personal data held about the Trust’s main contact or contacts at that organisation or their representatives)
- › Affiliated society members (generally relating to the Trust’s main contact or contacts at the Society but may also include their individual members) other people who engage with Gloucester Civic Trust

#### **4) Retention of personal data**

Gloucester Civic Trust will not solicit personal data from third parties. All data retained is limited to that which has either been volunteered to us by the party concerned or in the case of corporate/affiliated society memberships, is provided by someone as a contact point for the organisation. We only retain information on the following basis:

##### **a) Individual Members and Patrons**

Gloucester Civic Trust will retain personal information obtained from its individual members for as long as necessary for the Trust to administer membership (in conformity with the relevant



legislation). In practical terms this will mean:

- › Throughout the period that their membership is live
- › For a fixed period of time after their membership has elapsed as follows:
- › Until the end of the financial year following their membership elapsing
- › For those members whose membership fee is gift aided, the Trust is required by HMRC to retain this information for a period of six financial years after the end of the financial year in which the transaction occurred.

#### b) Corporate members and affiliated societies

Retention of corporate or organisational information relating to corporate members and affiliated societies falls outside of the scope of this Policy, whereas retention of personal information relating to individual members or employees of these organisations is within the scope of this policy.

Where personal data is retained relating to members of these organisations, The Trust will retain this information until the end of the financial year following that date upon which their organisation ceases to be a member of the Trust, following which it will be deleted, unless over-riding legislation requires retention for a longer period.

#### c) Other people who engage with the Trust

Gloucester Civic Trust engages with a wide variety of organisations and individuals both pro-actively and re-actively to fulfil its objectives. This may include information on matters of interest to both parties which may require personal data (usually contact information) to be retained for an extended period of time to enable contact to be maintained.

The Trust will only retain information for as long as it remains relevant.

## 5) Management and disposal of personal data

#### a) Responsibility for personal data management

Gloucester Civic Trust has a named data manager whose responsibility it is to oversee the management of data within the organisation. They report directly to a Trustee with corporate responsibility for data management. To avoid any conflict of interest, this Trustee will not normally be a committee chair. The data manager will ensure that data within the organisation is managed in accordance with this policy.

#### b) On-going audit of information held.

Notwithstanding the specific requirements of this policy, Gloucester Civic Trust will undertake a rolling audit of data held, using a data mapping process to demonstrate how we seek to comply with relevant data protection and privacy legislation.



### c) Staff and volunteer training

We will brief staff and volunteers on different aspects of data management and control to ensure compliance with this policy.

### d) Accountability

Gloucester Civic Trust's Council (Trustees) will receive an annual report jointly authored by the data manager and the Trustee with responsibility for data management which will outline how this policy is being implemented.

## 6) Communications Opt-in

Any new member or patron joining will be able to choose how we communicate with them by opting in-to a menu of communication options (Appendix I). These include:

- › By post (including our annual newsletter and notice of AGM)
- › Via email (including electronic newsletter, reminders about membership, notification of events at short notice)
- › By phone including text message (generally used to inform members at short notice – for example event cancellations)

We may also periodically contact members (via post or email) about events organised by others that we think may be of interest (though we will never provide third parties with information about our members, unless required by law).

Lapsed members and patrons who do not re-join until after the end of the financial year following their membership lapsing, also join on the basis of an opt-in.

## 7) Using your personal information to tailor your communications.

We may use the personal information you provide us to create a profile of your interests and preferences so that we may contact you with information relevant to you. You may opt-out of this in the same way as you can opt-out of other communications.

## 8) Opting into Gloucester Civic Trust communications (other people who engage with the Trust)

In relation to non-members who engage with the Trust, the Trust will assume that they do not wish to be contacted by the Trust about any matter that does not relate to the original nature of their engagement with the Trust. We may however seek consent to contact them about other matters which we feel may be of interest to them and will do so by asking them explicitly to opt-in to receiving such information:

- › By post
- › Via email



- › By phone including text message

We may also seek their permission to contact them (via post or email) about events organised by others that we think may be of interest (though we will never provide third parties with information about our members).

### **9) Information provided to affiliated societies and corporate members.**

Gloucester Civic Trust will contact these organisations by post, email and phone. As organisations, there is no formal requirement for Gloucester Civic Trust to obtain and opt in/opt out, but such organisations will always have the right to vary the way in which we communicate by mutual consent.

### **10) The rights of individuals whose personal information is retained by the Trust**

Anyone has a right to ask the Trust to inform them what personal information is held about them at any time. This information can be obtained either by contacting us by post or via email ([members@gloucestercivictrust.org](mailto:members@gloucestercivictrust.org)). We will strive to make this information available within one month of the request being made.

Anyone has the right to correct the personal information the Trust holds about them (or to request amendment). The information will be amended within one month of the request being made.

Individuals have the right to ask for all personal data to be deleted at any time. This will be done within one month of a request being received, unless the Trust believes that there is an over-riding legal requirement for the data to be retained. In those circumstances, the data will be retained, and the individual will be informed why their request has been declined.

Individuals may vary the nature and means of communication they receive at any time by notifying the Trust in writing by post or email ([members@gloucestercivictrust.org](mailto:members@gloucestercivictrust.org) ).

### **11) Historically significant information**

The Trust has the right to retain information that it deems to have potential or actual historical significance. Where personal information is included as part of this information, the Trust will retain the minimum personal information necessary to maintain the integrity of the information concerned but will not use this personal information for communication purposes.

Privacy terms

Where appropriate, Gloucester Civic Trust will include a paragraph indicating that we communicate in terms of an established privacy policy (see Appendix 2). This information will be included on all email and written communications; including event booking pages.



## **12) Storage of data by third party organisations**

Gloucester Civic Trust uses a variety of third-party systems to manage its activity (these include Eventbrite, Survey Monkey, Mailchimp, Doodle Polls). Any data extracted from these systems will then be managed according to this privacy policy. Individuals providing personal information using these platforms will also be subject to the terms and conditions of those platforms.

## **13) Use of 'Cookies'.**

Like many other websites, the Gloucester Civic Trust website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off Cookies by setting your browser preferences. For more information on how to switch off cookies on your computer. Turning cookies off may result in a loss of functionality when using our website.

## **14) Validity of this privacy policy**

Gloucester Civic Trust implemented this policy from 22 January 2021

*Current version as amended and agreed by Gloucester Civic Trust Trustees on 21 January 2021*



## Appendix 1

### Gloucester Civic Trust Consent Form (“opt in”)

Please complete this form to authorise us to contact you. This should be read in conjunction with the Trust’s privacy policy which can be found on the Gloucester Civic Trust website (<https://www.gloucestercivictrust.org/privacy-policy-2/>)

	Please tick to confirm
I have read the Gloucester Civic Trust’s Privacy Policy and agree to my personal data being used in the way described	
I consent to receive information about Gloucester Civic Trust’s activities and events, as well as information about events organised by others that Gloucester Civic Trust considers may be of interest to you	
You may contact me by email	
You may contact me by post	
You may contact me by telephone or text message*	

\*Note, this will normally only be done in an emergency.

### Photographs:

Gloucester Civic Trust may take photographs at events and these photographs may be used in future publicity materials. Given that Trust volunteers and staff may not be able to recognise everyone at an event, we would ask attendees to inform us if they do not wish their photos to be used in this way at the time the photographs are being taken.

I understand that the consents I have detailed above can be changed at any time by notifying the Trust via email ([data@gloucestercivictrust.org](mailto:data@gloucestercivictrust.org)) or by post.

Name

Signature

Date

[Check box for electronic version]



## Appendix 2

### Privacy terms statement

Gloucester Civic Trust is communicating with you in accordance with the terms of its privacy policy, a copy of which can be found at our website (<https://www.gloucestercivictrust.org/privacy-policy-2/>). You can choose at any time to opt-out of receiving communications from Gloucester Civic Trust by notifying us.