



Privacy Policy

Gloucester Civic Trust is committed to the lawful, fair and transparent processing of your personal data. This Privacy Policy should be read whenever you consent to us processing your personal data. If you volunteer with us, are an employee or trustee – please refer to your Volunteer Handbook, Employee Handbook or Trustee Handbook respectively.

1.0 Gloucester Civic Trust Ltd

Charity No.264719

Company Registration No. 01078805

Gloucester Civic Trust Ltd is a company limited by guarantee and a registered charity, established in 1972 primarily to manage, restore and preserve for the benefit of the public features of historic or public interest in the city of Gloucester, and to stimulate public interest in the area, making available community and educational resources.

1.1 Contact Us

You can contact us using the following details:

data@gloucestercivictrust.org

Gloucester Civic Trust Ltd
Bishop Hooper House
99-103 Westgate Street
Gloucester
GL1 2PG

Susan Smith is the Trust's Data Protection Officer. Please direct any complaints about the processing of your data to Susan Smith at the above address.

2.0 How and why we use your data:

2.1 Newsletters

When you sign up to receive one of our newsletters, you will provide your name, and your email address. We use your name to personalise our emails to you, and your email address so you can receive information from us.

We issue four different types of newsletters:

- **News** - for supporters of Gloucester Civic Trust. Trust news on projects, developments, partnerships, conservation, historical discoveries, and fundraising campaigns. *Frequency: up to every other month.*
- **Events** – for supporters of Gloucester Civic Trust A regular events listing with news on upcoming events, exhibitions, festivals and performances taking place within the Folk of Gloucester and its grounds, St Michael's Tower or with our Tour Guides in

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various locations.. Events listed may be run by third-parties. *Frequency: up to monthly depending on the volume of events. You may receive fewer emails out of season (Oct – Mar).*

- **Venue hire** – for events organisers and local businesses. Information on venue spaces, prices and changes and other ad hoc emails issued regarding venue spaces, new services. *Frequency: once a year, or when a new service is launched.*
- **Education** – for teachers, schools, youth groups and other youth service providers. Information on our educational offer. *Frequency: no more than quarterly.*

We will only send you the newsletter(s) if you have given your consent to do so. If you previously received our newsletter before the new GDPR regulations came into force on 25 May 2018 – and no longer do so – you will need to opt-in again. Please contact us using the details above.

Our newsletters are issued via [MailChimp](#), our email marketing provider. We may email you individually from time to time outside of MailChimp in order to manage our mailing list, report any security breaches, or for other emergency announcements.

2.2 Feedback Forms

As recipients of a [Heritage Lottery Fund](#) (NLHF) grant, we are required to evaluate our Projects including our recent conservation works to restore and improve the Folk of Gloucester buildings. You may agree to help us by completing feedback for us online, or by filling out a paper form. When you submit feedback, we do not ask for your name, which means it is extremely difficult to identify individuals from our data set. We do collect sensitive data such as your ethnic background and gender – as requested of us by NLHF – but all fields are optional, and if you are uncomfortable providing us with this information, you don't have to. Paper forms will be processed by GCT employees or volunteers, collated digitally, and the forms securely destroyed. The feedback will be collated, analysed and written up into an evaluation report.

The feedback helps us build a picture of our project's impact and provides a resource for planning new projects and making funding bids. It may also support the wider heritage sector, feeding into debates about the natural environment or community life. For NLHF, your feedback and our evaluation helps us to assess the effectiveness of our grants and spread the word about good ideas and successful projects. It also informs their future funding plans.

3.0 Website

When you browse our website, we collect data in order to understand your needs and provide you with a better service. In particular, we use the tracking information from Google Analytics to improve our website content and structure. For example, if data shows that a given page is not being read much, perhaps it needs to be rewritten, or linked to more clearly.

3.1 Cookies

Our website (www.gloucestercivictrust.org) uses cookies. A cookie is a small piece of information which is sent to your computer's hard drive by the website so that the website can store some information about your visit. This

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information may include information about your computer such as the computer's IP address and browser type and, if you arrived at our site via a link from third party site, the address of the linking page.

The IP address helps Google make sense of the data and it is never linked to your personal data. We only use information gathered by cookies in aggregate. For example, learning that 60% of people viewed the About page or that 50 people arrived at our website after reading one of our Tweets.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages visitors find useful and which visitors do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you remove cookies, some of our website features may not function as a result.

Cookies have names, here is list of the cookies we use and what they do:

- **Google Analytics**, aggregate tracking to see how well our website works:
 - **_ga**
 - **_gat**
 - **_gid**
- **Wordfence**, a firewall to protect our website:
 - **wfvt_X**
 - **wordfence_verifiedHuman**
- **Google Maps**, to use your Google Maps account preferences:
 - **NID**

3.2 Google Analytics

Our website uses web analytics services provided by Google, Inc which in turn uses cookies to help us analyse how users use the site. This tracks how people reached the website, how many people use the website, and which pages are looked at most.

Google as data processor

The information generated by the cookie about your use of our sites (including your IP address) will be transmitted to and stored on Google servers in the United States and/or United Kingdom. Google will use this information to evaluate our websites and compile reports on website activity. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. Google will not associate your IP address with any other data held by Google.

You can read Google's Privacy Policy here: <https://policies.google.com/privacy>. If you wish to refuse the use of cookies by Google please visit <http://tools.google.com/dlpage/gaoptout>. You may also refuse the use of cookies by selecting the appropriate settings on your browser.

3.3 Map data by Google

This website uses Google Maps to show you our business location. You can read Google's Privacy Policy here: <https://policies.google.com/privacy>

3.4 Contact form

We collect minimal personal data from our contact form, which works in a similar way to sending us an email. We may collect the following personal information:

- Your name if you submit it
- Your phone number and email address if you submit them

Submitted contact form information is **not** stored on the website.

We do **not** link this personal data with any other website data.

This website does **not** collect sensitive personal data.

3.5 Email marketing

You may submit your name and email address and consent to receive a newsletter from our website. See 2.1 for more information on how we process your data to issue our newsletters.

3.6 External links

Our website may contain links to other websites. Please be aware that we are not responsible for the content or privacy practices of these linked websites. We encourage our users to be aware when they leave our site and to read the privacy policies for any other site that collects personally identifiable information.

4.0 Legal basis:

We can process your personal data, because you give us your consent to do so. This gives us the legal basis to process your personal data for the purposes we specify under the GDPR. When you sign-up to receive a newsletter, or get asked to complete a feedback form, we will clearly explain how and why we will use your personal data. You have the right to withdraw your consent at any time.

5.0 Who we share your data with:

Newsletters

When processing your data, your data is shared with our email provider, **MailChimp**. Your contact information is stored in their servers, which enables us to email you. We monitor open rates of our mailing list, and periodically report on the size of our audience internally, and to the National Lottery Heritage Fund, as part of our Project obligations.

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Feedback

Data you provide by completing a feedback form are processed locally by GCT staff and/or directors and collated digitally. The digital files are uploaded and stored by our cloud content management provider, **NextCloud**. The final evaluation report will also be shared with **NLHF** in line with the reasons given in 2.2 above.

6.0 Transfers outside of the EU:

As a data controller, we manage your data locally. In order to issue our newsletter and process your feedback, we use the services of a number of organisations which in turn act as data processor, or sub-processor. Many of these organisations are based outside of the EU:

1. MailChimp

The Rocket Science Group, LLC
675 Ponce de Leon Ave NE
Suite 5000
Atlanta, GA 30308 USA

MailChimp has certified to the EU-U.S. Privacy Shield Framework. The European Commission has approved such transfers as affording adequate protection. This means, with your permission, we are able to share your data with MailChimp in order to issue our email newsletters.

2. NextCloud

NextCloud GmbH
Gerichtstrasse 23
Hof 5, Aufgang 6
13347 Berlin, Germany

NextCloud is a cloud content management provider, and has servers located in Germany and globally. The corporation has Processor Binding Corporate Rules and Controller Binding Corporate Rules and participates in the EU-US Privacy Shield Framework to provide a legally recognised way to transfer data outside the EU. Each file uploaded to NextCloud is encrypted at rest.

Key Gloucester Civic Trust documents – including our supporters’ database – are stored online using cloud content management provider, [NextCloud](#).

7.0 Retention:

Newsletter

Your data will be kept and processed as long as we have your consent to do so, the purposes for processing still apply, and you remain an active supporter of Gloucester Civic Trust.

We will periodically delete data each year from individuals who we are no longer able to contact - for example if your email address no longer works. We will determine whether you are no longer an active supporter by asking if you still wish to hear from us. We will also inform you of any changes we

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make to our Privacy Policy, and request consent from you should we wish to use your data in any other way than specified in this Privacy Policy.

8.0 Your rights:

Under the EU General Data Protection Regulation, you have the following rights:

- **You can request to see the data we hold for you at any time.** Please contact Data Manager Sue Smith with your full name and email address, and we will issue your data as a CSV file.
- **You can edit the personal details we hold for you at any time.** If you'd like to change your email address, name or any other information, please contact us specifying the changes you would like to make.
- **You can request we stop processing your personal data.** At any point, you can ask us to delete your information, to stop processing it, or restrict the extent to which we process your data. If we no longer keep your email address, we will be unable to send you our newsletter.
- **You have the right to complain** to a data protection authority about how we process your data. To do so, contact the Information Commissioner's Office, by telephoning 0303 123 1113, or visit: <https://ico.org.uk/concerns/>

9.0 Automated decision making:

Our email marketing provider MailChimp uses some simple automated decision making to manage email addresses and to ensure compliance with [spam laws](#). By signing up to receive our Newsletter you agree to this simple automated decision making and understand if we have trouble emailing you, even if you've received emails from us in the past, you may no longer receive our newsletter.

- **Hard bounces:** If you provide us with an incorrect email address or close your email account, and a newsletter bounces. MailChimp will automatically remove your email from our mailing list. A 'hard bounce' indicates a permanent reason an email cannot be delivered, for example the email address does not exist or is wrong, or you may have unsubscribed by accident.
- **Soft bounces:** Sometimes your mailbox may be full or our email server may be down and our newsletter may be unable to reach you. This is known as a 'soft bounce'. If further emails still aren't able to send successfully your email will eventually convert to a 'hard bounce' and be automatically removed from our mailing list. MailChimp allows for seven soft bounces for an email address with no subscriber activity (we manually added your email to our emailing list) and up to 15 soft bounces for subscribers with previous subscriber activity (you subscribed online or have changed your settings in the past) before converting a soft bounce into a hard bounce.

You can read more about how MailChimp manage emails that bounce [here](#). If you are experiencing problems, please do get in touch with us and we will investigate.

10.0 Privacy Policy updates:

We regularly review our privacy policy and may make changes from time to time.

Last reviewed: 20 July 2023

Next review: July 2026

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