

## Harewood House Trust Privacy Policy

### Introduction

Harewood House Trust is an independent educational charity set up to maintain and develop Harewood House, along with its collections and grounds, for the public benefit.

The privacy and security of your personal information is important to us. This privacy policy explains how and why we may use your personal data, to make sure you stay informed and can be assured when providing information to us.

This policy will be kept updated to explain how our activities may change in response to variations in data protection legislation and organisational developments. This policy applies if you're a supporter of the charity (member, donor, volunteer, tenant, customer, supplier or employee) or use any of our services, visit our website, email, call or write to us. Should the need arise, we may also provide extra privacy notices for specific new activities, which will refer to this page.

We will never sell your personal data and will only share it with organisations we work with when it's necessary, and the privacy and security of your data can be assured.

### Who are 'we'?

In this policy, whenever you see the words *we*, *us*, *our*, or *Harewood House*, it refers to Harewood House Trust Ltd and its wholly owned subsidiary, Harewood House Trading Ltd. Our registration with the Information Commissioner's Office (ICO) is Z5203232: [ico.org.uk/ESDWebPages/Entry/Z5203232](https://ico.org.uk/ESDWebPages/Entry/Z5203232)

Our mission is to preserve for the public benefit Harewood House and its ancillary buildings, gardens, arboreta, woodlands and park; to promote the study and appreciation of Harewood as a place of historic and cultural interest and natural beauty; to provide facilities for recreation and leisure-time occupations; and to advance the education of the public in the arts and the sciences.

If you have any questions in relation to this privacy policy or how we use your personal data, they should be sent to [info@harewood.org](mailto:info@harewood.org). A timely reply will be provided, along with details of how you can escalate any concerns within our organisation.

### Where and how we collect your information

We collect information which is deemed necessary, or which we believe will improve your interaction with us, in the following ways:

#### *Information you give us*

For example, when you make a purchase with us for tickets or animal experiences, give a donation or register for an event we will ask you for your personal information in order for us to process your purchase or donation or help arrange your event.

#### *Personal data created by your involvement with us*

Your activities and involvement with us may result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our activities.

### *Information we generate*

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our work we are able to build a profile which helps us decide which of our communications may interest you.

### *Sensitive personal data*

At times we'll collect sensitive personal data for Equal Opportunities research, as well as ensuring we are accessible to everyone; but this is only ever analysed at an aggregated level.

### *Volunteering with us*

If you're a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim) for safeguarding purposes. Bank details are collected to reimburse travel expenses.

### *Information collected automatically through our website*

In this privacy policy, where we talk about websites we are referring to websites owned by us, including, but not limited to, [harewood.org](http://harewood.org), (a cybersecurity certificated, secured protocol site).

### *Cookies*

Harewood House Trust uses cookies to collect information about how [harewood.org](http://harewood.org) is used. We use analytical cookies to allow us to calculate the number of people visiting our website and to help us find out how people use our website.

We may also use third party cookies through this website. Third party cookies are cookies that have been written on to your device by a website different from the website you are visiting.

By using our website you are agreeing to consent to our use of cookies. If you do not wish to accept this, you can amend your settings in your browser. You can also delete cookies at any time in your browser settings; visit [allaboutcookies.org](http://allaboutcookies.org) for more information.

### *Google Analytics (GA), MailChimp and similar partners*

We use GA and MailChimp to help us understand how visitors are using and engaging with our website and mail outs. This allows us to make improvements to our web services and your overall experience. The GA tracking tool uses a number of cookies to collect information and report website usage statistics and does so without personally identifying individual users.

The information generated by the cookie about your use of our website will be transmitted and stored by Google on servers in the United States. For more information about Google's privacy policy in regards to GA, please see [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html)

If you wish to opt-out of GA tracking please visit and install the Google Analytics Opt-out Browser Add-on here: <https://tools.google.com/dlpage/gaoptout/>

### *Information we get from other organisations*

When you allow third parties to share your details, or the information is available publically, this may be used by us in combination with information you have provided to us. For example, we may use census records to verify postal addresses before mailing renewal letters to members.

## **Children's personal data**

### *Family membership*

Children aged under 18 are included on family memberships and are members. We collect their names and dates of birth to ensure their right to free admission, if applicable. We don't ask children on family memberships to consent to marketing communications, and instead apply communication preferences of the main named contact given on setup of the membership.

## **How we use your personal data**

We'll only use your personal data for relevant, lawful purposes.

Personal data provided to us will be used for the purposes outlined in any fair processing notice in a transparent manner at the time of collection, in accordance with expressed preferences. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data.

Your personal data may be collected and used to help us deliver our charitable activities, help us raise funds, or complete your order or request. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our various services, websites and activities.

### *Marketing communications*

Your privacy is important to us, so we'll always keep your details secure. We'd like to use your details to keep in touch about things that may matter to you.

If you choose to hear from us we may send you information based on what is most relevant to you or things you've told us you like. We may also show you relevant content online. This might be about visiting, volunteering, membership, events, conservation work, or fundraising.

We'll only send information to you if you agree to receive it, and we will never share your information with other companies for their marketing purposes. If you agree to receive marketing information from us you can change your mind at a later date.

We may sometimes use third parties to capture your data on our behalf, but only where we are confident that the third party will treat your data securely, in accordance with our terms and in line with the requirements set out in the GDPR, e.g. collecting direct debits through banks.

We'll always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a member, volunteer, donor etc. Examples are:

- Transaction messaging, such as shop purchase confirmations and event booking confirmations.
- Membership-related mailings such as renewal reminders, updated terms or programme dates.

### *Membership including newsletters and updates*

We use the personal data you provide as a member to service your membership. This includes sending renewal information to annual members by mail and email, and sending information about our programme and your member benefits. It's also used to verify you when you contact our Visitor Information Centre.

We scan membership cards to check entitlement to free entry, to understand how and when our members visit and to help us send you more relevant communications. We may contact you for feedback on your visit and your overall experience of being a member of Harewood House.

#### *Fundraising, donations and legacy pledges*

Where we have your permission, we may invite you to support conservation work by making a donation, getting involved in fundraising activities or leaving a gift in your will.

If you make a donation, we'll use any personal information you give us to record the nature and amount of your gift, claim gift aid where you've told us you're eligible and to thank you.

Charity Commission rules require us to be assured of the provenance of funds and any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors. As part of this process we'll carry out research using publicly available information and professional resources. If this applies to you, we'll remind you about the process when you make your donation.

#### *Management of volunteers*

We need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include: contacting you about a role you've applied for or we think you might be interested in, expense claims you've made, shifts you've booked and to recognise your contribution; and to issue identity badges.

We do not share your personal information with any other organisations without your express consent. However, sometimes funders and other organisations ask that we share information about our volunteer programme. Any data shared would be anonymised and would refer to overall volunteering statistics, not to individuals.

#### *Retail sales and events management*

We process customer data in order to fulfil event and experience bookings, and retail activities. Your data will be used to communicate with you throughout the process, including to confirm we've received your order and payment, to confirm dispatch, to clarify where we might need more detail to fulfil an order or booking, or to resolve issues that might arise with your order or booking. We may also temporarily hold dietary requirements for catered events.

#### *Research*

We carry out research with our supporters, customers, staff and volunteers to get feedback on their engagement with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.

If you choose to take part in research, we'll tell you what data we will collect and why.

#### *Recruitment and employment*

In order to comply with our contractual and statutory obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees.

Such data can include, but isn't limited to, information relating to health, racial or ethnic origin, and criminal convictions. Further information on what data is collected and why it's processed is given below.

**Contractual responsibilities:** Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay, leave, maternity pay, pension contributions and emergency contact details.

**Statutory responsibilities:** Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

**Management responsibilities:** Our management responsibilities are those necessary for the organisational functioning of the charity. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, absence, disciplinary matters, e-mail address and telephone number.

### *Sensitive personal data*

This is defined as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

In certain limited circumstances, we may lawfully collect and process sensitive personal data without requiring the explicit consent of an employee:

- We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.
- We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies.
- Data about an employee's criminal convictions will be held as necessary.

### *Disclosure of personal data to other bodies*

In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs.

In order to fulfil our statutory responsibilities, we're required to give some of an employee's personal data to government departments or agencies e.g. for recovery of maternity pay.

## **Updating your data and marketing preferences**

We want you to remain in control of your personal data. If, at any time, you want to update or amend your personal data or marketing preferences please contact us in one of the following ways: [info@harewood.org](mailto:info@harewood.org) for general matters; [membership@harewood.org](mailto:membership@harewood.org) for membership matters; [volunteer@harewood.org](mailto:volunteer@harewood.org) for volunteer matters; or by phone on 0113 218 1000.

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

We always ensure that we have the necessary controls in place to protect the personal data you provide us with. We carry out regular audits of who has access to data so that we can ensure that both your electronic and printed data is only accessible to trained staff.

### *Your credit and debit card information*

We make every effort to maintain customer confidentiality when securing an online payment. This includes ensuring the security of your credit card details and other personal information. We don't store your card details on our systems. All of your personal information is encrypted as it travels over the internet. When you make a booking, you enter a secure internet site. When you make a payment you enter details directly into our payment provider's secure site.

Creating a new Direct Debit mandate online requires your name, address, email address, and details of your bank account. This information is used to set up a regular Direct Debit payment with your bank and is retained by us securely in order to claim monthly or annual payments from your account. All transactions are covered by the Direct Debit Guarantee.

### *Third parties*

Sometimes we use external companies to collect or process your personal data on our behalf. We carry out thorough checks on any companies we work with and have a contract in place with each of these companies to ensure that they process your information appropriately.

If requested we may need to supply your information to the police, regulatory bodies or legal advisors. We will not share your data with any other third parties unless you have given your explicit consent for us to do so.

## **Your right to your personal information**

Under the General Data Protection Regulation you have the right to request a copy of the personal information we hold about you. You also have the right to request that we erase any personal information we hold, where we has no compelling reason to continue processing this.

If you wish to request this information please contact [info@harewood.org](mailto:info@harewood.org) or phone 0113 218 1000. We will then send you a form which you will need to complete and send back to us by post. We will also require you to provide two forms of identification. Once we have received your information request and your identification, we will respond within one month.

## **Updates to this privacy policy**

We may make changes to this Privacy policy. If we do make any significant changes to the way we collect and process your personal information we will make this clear on the Harewood House website, or by contacting you directly, but encourage all data providers to regularly review this Privacy Policy.

**This policy was last updated on May 15th 2018.**