

## Privacy Notice

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you whilst we are working with you and for a period thereafter. It also explains your rights under the law relating to your personal data. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'Privacy Notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### 1 Who collects and uses the information?

The St Andrews Preservation Trust Ltd (the 'Charity') is a 'data controller' and gathers and uses certain information about you. Where the Charity is also a 'data processor', we will process information received from third parties about you.

The St Andrews Preservation Trust Ltd is a Company Limited by Guarantee registered in Scotland under company number 20194 and is a Registered Scottish Charity No. SC011782

Registered address: 4 Queen's Gardens, St Andrews, KY16 9US OR

Main trading address: 4 Queen's Gardens, St Andrews, KY16 9US  
12 North Street, St Andrews, KY16 9PW

### 2 What is personal data/information?

Personal data is defined under data protection laws in the UK and Europe as 'any information relating to an identifiable person who can be directly or indirectly identified' and is, in effect, any information about you that enables you to be identified. This would include obvious information such as your name and contact details, but could include less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we collect, process and store is set out in this Notice.

### 3 Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

#### 3.1 About the information we collect and hold

We collect data you provide to us. This includes information you give when you communicate with us, apply for membership, purchase tickets or products, sign up to receive communications from us, make a donation, apply for employment, volunteer or enter into a contract with us. For example we may hold:

- personal details (name, date of birth, gender, email, address, phone number)
- family and spouse/partner or next of kin details
- financial information (such as credit/debit card details, bank details for standing orders, and whether your donations are gift-aided)
- your response to Preservation Trust Events or your intention to meet a member of our Board of Trustees, staff or volunteers
- details of ways in which you wish to be contacted by us.

If you purchase membership as a gift for someone, join as a family or if you are the parent/guardian of one of the juniors from the Museum, your details will be recorded (as will the recipient's) and your relationship to that person will be recorded.

### 3.2 Personal data generated by your involvement with the Museum

Your activities and involvement in our Museum will result in personal data being generated. This could include:

- Details of areas of interest in the Museum's collections
- Your visits to our study rooms and archives
- Your attendance to events
- Where you have asked us for information or written to us
- Your visit to our website
- Images of you captured on our CCTV system
- Your purchasing history
- How you've helped by volunteering or donating money or objects to us
- If you have applied for a job with us.

### 3.3 Personal data from third parties

We sometimes receive personal data about you from third parties, for example, if we are partnering with another organisation or where we may use third parties to help us conduct research and analysis about you to determine the success of our public offer and to help us provide you with a better experience (and this can result in new personal data being created).

We may collect information from social media about you, or if you post on any of our social media pages.

Occasionally, we may collect personal data about you (for example if you are particularly well known or influential) from the media and other publicly available sources. This may come from public databases (such as Companies House), news or other media. The sort of information we obtain from these sources might include details of other charities you may support and indicators of your leisure interests and your locality such as post code.

### 3.4 Sensitive Data

We do not normally collect or store special categories of personal data. However there are some situations where we may need to do so. These may include, for example, if you work or volunteer with us or apply to do so, or if we need to know about any access, medical or dietary requirements you, or someone in your care, may have.

## 4 How we use your personal data

### 4.1 General Use

We only ever use your personal data with your consent, or where it is necessary in order to: enter into, or perform, a contract with you;

- comply with a legal duty;
- protect your vital interests;
- carry out a task in the public interest; or
- for our own (or for a third party's) legitimate interests, provided your rights do not override these interests.

In any event, we will only use your personal data for the purpose or purposes for which it was obtained.

## 4.2 Marketing

We use your personal data to communicate with you in order to promote our activities and events and to help with fundraising. This includes keeping you up to date with our exhibitions, events and products in our Museum gift shop, and to send you general information about fundraising, membership and other ways you may be able to support us or benefit from The St Andrews Preservation Trust Museum.

## 4.3 Administration

We use your personal data for administrative purposes including:

- receiving donations (e.g. standing orders or gift-aid instructions);
- maintaining databases of our Members and other supporters;
- processing membership subscriptions;
- performing our obligations under Membership contracts and other supporters' agreements;
- managing custody of our collection including our intellectual property rights;
- carrying out due diligence to meet our compliance duties (for example, before making any acquisition into our collections, accepting financial support or making agreements for the supply of goods and services);
- processing enquiries and requests for information;
- managing feedback, comments and complaints we receive;
- fulfilling orders for tickets, goods or services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences;
- recruitment and staff management including pay, tax and pensions administration;
- management of suppliers of goods and services;
- managing your visit to The St Andrews Preservation Trust Museum and Office (e.g. health and safety; security, lost property, and incident management);

## 4.4 Internal Research and Profiling

We carry out research and analysis on our visitors, Members and other supporters to determine the success of our public offer and programmes and other activities in the public interest and to help us provide you with a better experience (for example so that you only receive communications about areas of our activities or research you are mostly likely to be interested in).

We may evaluate, categorise and profile your personal data in order to tailor materials, services and communications (including targeted advertising) to your needs and your preferences and to help us to understand our membership and audiences. For example, we may keep track of the amount, frequency and value of your support including your charitable involvement elsewhere. This information helps us to ensure communications are relevant, timely and in the best interest of our charitable purposes.

## 5 Disclosing and sharing personal data

We will never sell your personal data.

If you have opted-in to marketing, we may contact you with information about our selected partners. These communications will always come from us and will usually be incorporated into our own marketing.

We may share your personal data with contractors or suppliers who provide us with services. For example we may use external banks for the handling of payments and email providers for our marketing communications. Information is transferred to data processors securely, and we retain full responsibility for your personal data as the data controller. These activities are carried out under a contract which imposes strict requirements on our suppliers to keep your personal data confidential and secure.

Occasionally, we arrange events with other organisations. We may share your personal data with such organisations, for example where you register to attend events. We will only share information when necessary.

We may share your personal data where required to do so for prevention of crime or for taxation purposes (for example, with the police, HMRC) or where otherwise required to do so by other regulators or by law (e.g. the Charity Commission, Companies House).

## **6 Fundraising and marketing communications**

### **6.1. Consent**

Unless you have already given us your email address or telephone number so that we can tell you about making donations to us or about the supply of goods and services, we must ask you to “opt-in” to receive fundraising and marketing emails from us. You have the choice as to whether you want to receive or continue to receive these messages. You are also able to select how you want to receive them (post, phone, email, text) and to change your preferences at any time.

When you receive a communication from us, we may collect information about your response and this may affect how we communicate with you in future.

### **6.2. Newsletters and magazines**

If you are a Member, we will send you our bi-annual newsletter (unless you specifically ask us not to) and you can choose to unsubscribe from general marketing communications to Members without cancelling your subscription to The St Andrews Preservation Trust Ltd.

## **7 Children and young people**

### **7.1. Information for parents and guardians**

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of those aged 13 or younger.

We will not use the personal data of children or young people for marketing purposes and we will not profile it.

Personal data about children and young people is only accessible by our staff and trained volunteers on a strictly need to know basis.

## **8. Data security**

### **8.1. Protection**

We employ a variety of physical and technical measures to protect information we hold and to prevent unauthorised access to, or use or disclosure of your personal data.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Staff and Board of Trustees receive data

protection training and we maintain a set of data protection procedures which our staff are required to follow when handling personal data.

## **9 CCTV**

The St Andrews Preservation Trust Museum premises is protected by CCTV and you may be recorded when you visit the Museum in St Andrews. We use CCTV to help provide a safe and secure environment for visitors, for our staff and for the collection and to prevent or detect crime.

The system is managed in accordance with our standard operating procedures and with good practice guidance issued by the Information Commissioner's Office. CCTV images will only be accessed by authorised staff and trustees and will be deleted every 30 days or sooner.

## **10 Storing your personal data**

### **10.1 Where we store data**

We are wholly based in the UK and store data within the European Economic Area. Some organisations which provide data processing services to us do so under contract and may be based outside of the EEA. We will only allow them to do so if your data is adequately protected.

### **10.2. Retention of your personal data**

We will only retain your personal data for as long as it is required for the purposes for which we collected it (e.g. we have a genuine and legitimate reason and we're not harming any of your rights and interests). This will depend on our legal obligations and the nature and type of information and the reason for which we collected it. For example, should you ask us not to send you marketing emails, we will stop storing your email address for marketing purposes; however we will need to keep a record of your preference.

We continually review what information we hold and will delete personal data which is no longer required.

## **11. Control of your personal data**

### **11.1. Your rights**

We want to ensure you remain in control of your personal data and that you understand your legal rights, which are:

- the right to know whether we hold your personal data and, if we do so, to be sent a copy of the personal data that we hold about you (a "subject access request") within one month;
- the right to have your personal data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate personal data rectified;
- the right to object to your personal data being used for marketing or profiling; and
- (where technically feasible) the right to be given a copy of personal data that you have provided to us (and which we process automatically on the basis of your consent or the performance of a contract) in a common electronic format for your re-use.

There are some exceptions to the rights above and, although we will always try to respond to any instructions you may give us about our handling of your personal information, there may be situations where we are unable to meet your requirements in full.

If you would like further information on your rights or wish to exercise them, please contact our Trust Administrator at the address below.

Should you wish to make a subject access request, we can provide you with a template form which includes guidance on how to do this. Please contact us for a copy of the template for a subject access request.

### **11.2. Complaints**

Should you have a complaint about how we have used ('processed') your personal data, you can complain to us directly by contacting our Trust Administrator in the first instance.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

### **12 Links to other sites**

Our websites contain links to other external websites. We are not responsible for the content or functionality of any such websites. Please let us know if a link is not working by contacting [trust@stapt.org.uk](mailto:trust@stapt.org.uk)

If a third party website requests personal data from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by this privacy policy. We suggest you read the privacy notice of any other website before providing any personal information.

### **13 Changes to this privacy policy**

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 data. The current version of our privacy policy will always be posted on our website.

Any questions you may have in relation to this privacy policy or how we use your personal data should be sent to our Trust Administrator, The St Andrews Preservation Trust Ltd, 4 Queen's Gardens, St Andrews, KY16 9US or email [trust@stapt.org.uk](mailto:trust@stapt.org.uk)

*This Policy was approved by the Trustees of the The St Andrews Preservation Trust in May 2018 and will be reviewed annually,*