

Jarrow Hall Privacy Notice 2018

This privacy notice sets out how we use, or “process”, any personal information we collect from you. It is produced in compliance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 which was implemented on 25 May 2018.

The GDPR states that personal data can only be processed if there is a legal ground to do so. The GDPR provides six legal grounds under which personal information can be processed lawfully and stipulates that an organisation’s privacy notice must include reference to this.

Information on the legal basis for processing of personal information by Groundwork South Tyneside and Newcastle is set out below and in Appendix 1 of this notice.

Who we are

Jarrow Hall is a visitor attraction and heritage site operated by Groundwork South Tyneside and Newcastle in partnership with South Tyneside Council.

Groundwork South Tyneside and Newcastle is registered with the Information Commissioner's Office under registration reference ZA121969

The Data Protection Officer for Groundwork South Tyneside and Newcastle is Sarah French

Address:

The Eco Centre, Windmill Way, Hebburn, Tyne and Wear, NE31 1SR

Tel: 0191 428 1144

Email: sarah.french@groundwork.org.uk

The data that we may collect

We may collect the following information:

- name and job title, place of work or study
- contact information including email address
- demographic information such as salary band, postcode, preferences and interests
- other information relevant to customer interests, surveys and/or offers
- bank details for direct debit processing
- IP addresses
- access and dietary requirements or health information
- date of birth, gender, sexual orientation, ethnicity, disability and other information for monitoring diversity

How we use your information

We collect information for various purposes as outlined below:

Annual Pass Schemes

Our annual pass schemes (including Unlimited Pass and Friend of the World of Bede) provide unlimited general admission alongside offers at Jarrow Hall and Hive Coffee Company. We may also provide you with information relating to projects undertaken by Groundwork South Tyneside and Newcastle or other sites operated by the trust via your preferred means of communication.

By registering an annual pass you consent to your name and contact details being stored on our database, along with information you give us about your interests in any of other Groundwork South Tyneside and Newcastle sites. This allows us to provide you with information, special content and offers for events and programmes at our venues that we think will best match your interests. It also means we can offer you volunteering opportunities, tell you about fundraising initiatives for our venues and our other services including venue hire and updates about our cafes and shops.

As an annual pass holder we will provide you with information on our websites and by email if you have agreed that we may do so.

We will process your data on the basis of your consent only in accordance with the purpose or purposes that it was originally collected for and will only keep your data for as long as necessary.

We will contact you every 1 year for annual pass renewal and roughly every three years on a rolling basis to check whether you still wish to subscribe to news and information via email or post. If you do not re-consent to being contacted at that stage we will delete your information from our records.

If you no longer want to be an annual pass scheme member and wish to have your information removed or you would like us to correct or remove information that you think is no longer accurate, you can should complete the form on the member area of the website or contact us at jarrowhall@groundwork.org.uk

We will not share your information for any other purpose or share your information with any other organisation, excluding those we use for specific purposes related to your relationship with Jarrow Hall as outlined in the *Third Party Organisations* section of this document.

Tickets for Events and Exhibitions

We will process your data on the basis of your consent only in accordance with the purpose or purposes that it was originally collected for and will only keep your data for as long as necessary. We will process it on the basis of your consent and that it is necessary for the purposes of a contract that you have entered into in purchasing tickets from us. We will not use your information for any other purposes.

Archives and Collections

If you make an enquiry about our archives or collections, we will ask you for your contact details in order to report back to you. We will keep your details on record until your enquiry has been completed, at which point we will destroy your information. You may ask for your information to be retained by us in relation to an archive or collection and we will agree with you how long your information may be held for that purpose. We will not use your information for any other purposes. We will only process your information with your consent.

Similarly, if you make a deposit, donation or loan, we will ask you for your details and keep these on record for the duration of the deposit, donation or loan at which point we will destroy your information unless it is necessary to retain this information as part of our archive, in which case, we will advise you of this. We will not use your information for any other purposes. We will only process your information with your consent.

Learning

When you enquire about one of our learning programmes, courses, activities or services, on behalf of yourself or a school or educational establishment you represent, we will ask you to provide personal information to allow us to supply you with the relevant information you will need. Unless you have opted in to our marketing mailing lists, we will only contact you about the particular programme, course, activity or service that you have enquired about, by your preferred means of contact.

We will process your data only in accordance with the purpose or purposes that it was originally collected for and will only keep your data for as long as necessary. We will contact you at the end of each school academic year to check whether you still wish to subscribe to our services. If you do not re-subscribe at that stage, we will delete your information from our records.

Surveys/Questionnaires/Evaluation Form

Sometimes we will ask you to complete a survey, questionnaire or evaluation form about our services, in order to help us monitor and improve them, or because we are required to provide this information by our funding providers. Unless you opt in to our marketing mailing lists, we will only use your information for the purposes of the survey you have completed.

We will process your data on the basis of your consent only in accordance with the purpose or purposes that it was originally collected for and will only keep your data for as long as necessary.

Photographs, Video or Audio recordings

Sometimes we will ask for permission to take photographs, video or audio recordings of individuals to use as part of our programmes and exhibitions, or to help promote our services. We will always ask for your consent before we do this and ask you to complete the relevant forms authorising us to proceed.

We retain the images and recordings for three years from date of consent. After three years we will either ask you if you are willing to extend your consent for their continued use, or we will delete them. The processing is on the basis of your consent.

Volunteering applicants

If you apply to volunteer at Groundwork South Tyneside and Newcastle we will use the information you supply to process your application and to monitor recruitment statistics. Where we need to disclose information to a third party, for example where we want to take up a reference or obtain a

'disclosure' from Disclosure Scotland or the Disclosure and Barring Service, we will not do so without first informing you.

Personal information about unsuccessful candidates will be held for 6 months following completion of the recruitment exercise, after which it will be destroyed unless you have asked us to destroy it earlier or you have consented in writing to its longer retention.

Personal information about successful volunteers will be held for the duration of your volunteering and for 6 months afterwards, after which it will be destroyed.

Mailing Lists

Members of the public can sign up to our mailing lists or submit information to our database. We will process your data on the basis of your consent only in accordance with the purpose or purposes that it was originally collected for and will only keep your data for as long as necessary.

If you sign up to our mailing lists, we will retain your information for 3 years before contacting you to check whether you still wish to subscribe to this service.

If you submit information to our database, this information will be held indefinitely, unless you ask us to remove it.

How we use your information from digital/internet access:

Cookies

Cookies are text files placed on your computer to collect standard internet log information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser.

Other websites

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy notices.

Internet enabled devices

If your smartphone, tablet or another device is Wi-Fi enabled, it can still be detected by the free Wi-Fi service even if you have not signed into it. If you do not wish this to happen, you can disable the Wi-Fi function on your device.

Third Party Organisations

We will not share personal data with third party organisations for marketing purposes.

We may however share your information with our associated organisations listed below, in order to continue to improve our understanding of our target audiences and supporters:

Friends of the World of Bede

For the purpose of membership management and so that you can be kept informed your information will be shared with the Friends of the World of Bede (registered charity number 1168975).

Epos Now

For the purpose of membership management your information will be stored on our Point of Sale database which is accessible by Epos Now (company number 07666961). You can view their Privacy Policy at <https://www.eposnow.com/internal/en-dpa-april-2018.pdf>

MailChimp

For the purpose of newsletter and bulk email management your information will be shared with MailChimp. You can view their Privacy Policy at <https://mailchimp.com/legal/privacy/>

What information security we have in place

We are committed to ensuring that your information is secure. All our employees and data processors that have access to and are associated with the processing of your personal information are obliged to respect the confidentiality of your information and have been trained in GDPR legislation and practice.

We regularly review policies, data management processes and procedures to ensure they are compliant with the new GDPR. All employees who process your data will be required to familiarise themselves with these policies and agree to abide by them.

Please be aware that communications over the internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the world wide web/internet. Groundwork South Tyneside and Newcastle cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

What we will do in the event of a data breach

Groundwork South Tyneside and Newcastle will notify the ICO (and where required individuals or organisations) of a breach where it is likely to result in a risk to the rights and freedoms of individuals

– if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

How we will update our contracts or agreements with data controllers and data processors

Data controllers and data processors are other organisations (or individuals) which control and/or process information on our behalf.

Under the GDPR, our contracts or agreements with data controllers and data processors need to contain certain minimum provisions, such as a description of the scope, nature and purpose of processing.

We are reviewing and updating our agreements and contracts with third parties to ensure they have appropriate policies and security measures in place to comply with the GDPR and safeguard the personal data we hold.

When we appoint new third parties to act as data controllers and data processors on our behalf, we will ensure that there are appropriate provisions in relation to their own compliance with the GDPR and other relevant matters such as compliance, monitoring and reporting.

Access to personal information and correction

Whilst we strive at all times to ensure that your personal information is accurate and up to date, we recognise that on occasions we may get it wrong or your details may change. You may ask us to correct or remove your personal information by contacting us as detailed below in the “How to contact us” section.

You can request a copy of information that we hold about you, by submitting a request in writing as set out in the “How to contact us” section below.

How long we will retain data

Data will only be processed in accordance with the purpose or purposes that it was originally collected for and will only be kept for as long as necessary. We will review at regular intervals the length of time we keep personal data.

We will consider the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it.

We will securely delete information that is no longer needed for this purpose or these purposes; and update, archive or securely delete information if it goes out of date.

Transfer of data to outside the EU

The GDPR imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organisations. These restrictions are in place to ensure that the level of protection of individuals afforded by the GDPR is not undermined.

Personal data may only be transferred outside of the EU in compliance with the conditions for transfer set out in Chapter V of the GDPR.

There are no current circumstances where Groundwork South Tyneside and Newcastle will transfer your data outside the EU.

Complaints, enquiries and feedback

Groundwork South Tyneside and Newcastle tries to meet the highest standards when collecting and using personal information. We will not unduly prioritise our interests as an organisation over your interests as an individual. We will always aim to balance our interests with your rights. We will only use personal information in a way and for a purpose that is in accordance with this notice.

For these reasons, we take any complaints we receive very seriously. We ask you to notify us of any collection or use of your information that you think is unfair, misleading or inappropriate by contacting us at the address given in 6 below.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Groundwork South Tyneside and Newcastle collection and use of personal information. We will endeavour to provide further detail at the point we collect any other personal information and we are happy to provide any additional information or explanation if needed.

How to contact us

If you wish to make a complaint, request further explanation about any issues relating to this privacy notice, or make a suggestion for improving our processes relating to the way we use personal data, then please direct your request to jarrohall@groundwork.org.uk or in writing at the following address: Data Protection Officer, Groundwork South Tyneside and Newcastle, The Eco Centre, Windmill Way, Hebburn, NE31 1SR

You may opt out from receiving marketing communications from us at any time, change your contact preferences or ask to have your personal data removed or corrected in our records by writing to us at: Data Protection Officer, Groundwork South Tyneside and Newcastle, The Eco Centre, Windmill Way, Hebburn, NE31 1SR or by sending an email to jarrohall@groundwork.org.uk. Please ensure that you state your full name and address in the letter or email so that we may locate your record on our database.

Information Commissioner's Office

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights. You can make a complaint to the ICO about our use of your information at any time on 0303 123 1113 or via their website at <https://ico.org.uk/>.

Of course we'd like to try and help you with any problems you are having first, so please consider raising any issue or complaint you have in the first instance with Groundwork South Tyneside and Newcastle. Your satisfaction with our services is very important to all of us and we will always strive to resolve any problems and complaints you have wherever possible. You can contact us at: jarrohall@groundwork.org.uk

Changes to this privacy notice

We keep our privacy notice under regular review. You are advised to visit this page periodically in order to keep up to date with any changes. By continuing to use our services you will be deemed to have accepted such changes. This privacy notice was last updated on 15th June 2018.

Appendix 1 – Groundwork South Tyneside and Newcastle Lawful Bases for Processing Data

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)