



Inspired by the past to build a better future together

NEWHAVEN HERITAGE PRIVACY POLICY

in accordance with the GDPR Act, 2018

Mission Statement

Victoria Primary school will be reborn as the Newhaven Heritage Centre. Owned and run by the people of Newhaven, for local people, it will meet their needs and wants.

We will create a place in which everybody will be valued equally, and will feel welcome to meet, socialise, learn and enjoy themselves and have their lives enriched.

For over a hundred and seventy years the school has been central to the community of Newhaven, providing a supportive, stimulating and inclusive environment. Redeveloped as the Newhaven Heritage Centre and community hub, it will extend that embrace to the entire community and beyond.

We will value and learn from our past and work with all the people of Newhaven to make this vision a reality.

Our Values

In whatever we do, we will be guided by our fundamental commitment to the principles of equality, respect for all individuals, fairness and transparency.

We will work collectively and support each other.

We will be welcoming, accepting and open minded.

We are committed to promoting social integration and for people of all ages working and learning together.

We believe in the empowerment of the people of Greater Newhaven so that they can build the kind of inclusive, caring, confident and supportive community we all wish to live in.

How we use your personal information

Your information will be held by the Newhaven Heritage Centre also known as Newhaven Heritage (NHC). This privacy notice is to let you know how NHC promises to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a user/customer, and the choices you give us about what marketing you want us to send you. This notice also tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private
- Not to sell your data
- To give you ways to manage and review how we use your data at any time

Personal information and the law

This section tells you who we are, what your personal information is, and how we get it. It explains how the law protects you by controlling what is allowed to happen to it.

Who we are

Newhaven Heritage Centre
8 Biggar Road
Fairmilehead
Edinburgh
EH10 7BQ

We are registered as a Scottish Charity, and our registration number is: SC044837

Any electronic communications will be made in accordance with the Privacy and Electronic Communications Regulations (PECR)

How the law protects you

As well as our Privacy Promise, your privacy is protected by law. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside NHC. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

For example, as a Charity, we have a **legal obligation** to collect details about our members. As a museum, it is in our **legitimate interest** to hold information on donors of objects to our collections. As suppliers or as users of our services, we may need your information to fulfil a **contract**. Or you may **consent** to give us your information for a particular purpose such as to receive information about our events.

When we have an organisational reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going to rely on it as the reason for using your data. Even then, it must not unfairly go against your interests.

What we use your personal information for:

	Our reasons	Our legitimate interests
Serving you as a visitor/customer	Your consent	Keeping our records up to date, working out which of our products and services may interest you and telling you about them Developing products and services, and what we charge for them Defining types of customers for new products or services Seeking your consent when we need it to contact you Being efficient about how we fulfil our legal and contractual duties
To manage our relationship with you or your business	Fulfilling contracts	
To develop and carry out marketing activities	Our legitimate interests	
To study how our users use products and services from us and other organisations	Our legal duty	
To communicate with you about our products and services		
To develop and manage our products and services		

Managing our operations

To deliver our products and services	Fulfilling contracts	Being efficient about how we fulfil our legal and contractual duties
To make and manage customer payments	Our legitimate interests	Providing services to learners, visitors, members and volunteers
To collect and recover money that is owed to us	Our legal duty	Complying with rules and guidance from regulators
To maintain records for historical interest		

Managing security and risk

To manage risk for us and our users/customers	Fulfilling contracts	<ul style="list-style-type: none"> • Complying with rules and guidance from regulators
To obey laws and regulations that apply to us	Our legitimate interests	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties
To respond to complaints and seek to resolve them	Our legal duty	

Business Management

To run our business in an efficient and proper way. This includes: managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit

Our legitimate interests

Our legal duty

Complying with rules and guidance from regulators

Being efficient about how we fulfil our legal and contractual duties

To exercise our rights set out in agreements or contracts

Fulfilling contracts

For processing special categories of personal data

Substantial public interest

To develop and manage our products and services

Using criminal records data to help prevent, detect and prosecute unlawful acts and criminal behaviour

Using aggregated data to target and monitor the effectiveness of our services

Responding to regulatory requirements • Passing information to the regulator as needed

Legal claims — Using any special categories of data as needed to establish, exercise or defend legal claims

Consent — Telling you that we need your consent to process special categories of personal data, when that is what we rely on for doing so

What information do we collect about you?

We collect the personal data that you may volunteer as part of ticket bookings, online purchases, Membership or donation forms, mailing list sign-ups and visitor surveys.

Personal information we collect may include:

- your name, title, gender and date of birth;
- postal address, email address and phone number;
- family and spouse/partner details, relationships to other donors and/or Members;
- current interests and activities
- special types of data

Where we collect personal information from

We will collect and hold information from any contact you have with us as a visitor, customer or supporter of NHC.

Data you give to us:

- When you apply for our services e.g. ticketed events, membership
- When you talk to us on the phone or in person, including recorded calls and notes we make
- When you use our websites, mobile device apps or social media services
- In emails and letters
- In visitor surveys
- If you take part in our competitions or promotions
- If you sign up to our mailing list

When we ask you to provide your personal information we will let you know why we are asking, and how we will use your data, by directing you towards this notice.

Data we collect when you use our services:

Payment and bank details depending on your method of payment for services

Profile and usage data

We use cookies and other internet tracking software to collect data while you are using our websites or mobile apps

Data shared by outside companies we use to deliver our services:

- Contact details shared by firms used for online ticketing and payment such as Eventbrite and/or Paypal (no financial data is shared)
- Information shared by social networks when you interact with our social media

These companies are required to ensure any transfers of data will be done securely, in accordance with best practice, and in compliance with the Data Protection Regulations.

How long we keep your personal information

We will keep your personal information for as long as you are a member, donor or customer of NHC.

We may keep your data for up to 6 years after you stop being a member/customer. The reasons we may do this are:

To respond to a question or complaint, or to show whether we gave you fair treatment

To study data as part of our own internal research

To obey rules that apply to us about keeping records

We may also keep your data for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons, or for the legitimate interests of the organisation. This would include data relating to the objects in our collections that would be stored for archival or historical interest.

We will only use your personal information for those purposes and will make sure that your privacy is protected.

If you choose not to give personal information

You can choose not to give us personal information. However, we may need to collect personal information by law, or to enter into or fulfil a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from fulfilling our contract with you, or doing what we must do by law. It could mean that we cancel a service you have with us.

We sometimes ask for information that is useful, but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it won't affect the products or services you have with us.

Cookies

Cookies are small computer files that get sent down to your PC, tablet or mobile phone by websites when you visit them. They stay on your device and get sent back to the website they came from, when you go there again. Cookies store information about your visits to that website, such as your choices and other details. Some of this data does not contain personal details about you or your business, but it is still protected by this Privacy notice.

To find out more about how we use cookies, please see our Cookies Policy

The control you have

This section covers how to complain or withdraw your consent. It also tells you how you can get a copy of your personal information, or ask for it to be changed or removed.

How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us: by email to clerk@newhavenonforth.org.uk;

or write to us at Newhaven Heritage, 8 Biggar Road, Fairmilehead, Edinburgh, EH10 7BQ

You also have the right to complain to the regulator, and to lodge an appeal if you are not happy with the outcome of a complaint. In the UK this is the Information Commissioner's Office. Find out on their website how to report a concern.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us at clerk@newhavenonforth.org.uk; if you want to do so.

This will only affect the way we use information when our reason for doing so is that we have your consent. See the section 'Your Rights' about more generally restricting use of your information.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

How to get a copy of your personal information

You can ask us if we are keeping any personal data about you and you can also request to receive a copy of that personal data – this is called a Subject Access Request.

To make a Subject Access Request you will need to provide adequate proof of identity such as a copy of your passport, birth certificate or driving licence before your request can be processed.

Please try to be as clear as possible about the information you are seeking.

Once we have received your Subject Access Request and proof of identity, you will receive a response from us within 28 days and you will be able to get copies of any information we hold on you. However, exemptions to disclosure may apply in some circumstances.

Subject Access Requests should be sent to:

Newhaven Heritage Centre
8 Biggar Road
Fairmilehead
Edinburgh
EH10 7BQ

Email: clerk@newhavenonforth.org.uk

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong, incomplete or out of date. We'll take reasonable steps to check this for you and correct it. Please contact us at newhavenheritage@gmail.com if you think this is the case.

Your rights

You can object to us keeping or using your personal information. This is known as the right to object.

You can also ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the right to erasure or the right to be forgotten.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights.

You can ask us to restrict the use of your personal information if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It is not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it

If we do restrict your information in this way, we will not use or share it in other ways while it is restricted.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us at clerk@newhavenonforth.org.uk

How personal information is used

This tells you what we do with your personal information, who we share it with and what it is used for to fulfil our services and in marketing.

What we do with your information

Depending on your relationship with NHC, and the preferences you have indicated, data we hold may be used by us for the following purposes:

To send you promotional, marketing or fundraising information by post, telephone or electronic means. These types of communications can include:

- Informing you of other products, services or events related to Newhaven Heritage such as exhibitions, events, or retail offers.
- News and updates about Newhaven Heritage, such as our Bow-Tow newsletter and events.
- Information on our fundraising operations, including occasional targeted requests to consider giving financial support to Newhaven Heritage, or to ask you to consider supporting us in other ways.
- Other relevant communications based upon your relationship with Newhaven Heritage.
- To send you surveys, and for market research purposes.

If you change your mind you can update your choices at any point simply by contacting newhavenheritage@gmail.com.

There are some communications that we are required to send regardless of your contact preferences. These are essential communications, deemed necessary to fulfil our contractual or legal obligations to you. This would include thank you letters, Member benefits such as our Newsletter and Membership cards, renewal reminders and querying returned mail or bounced Direct Debit payments with you.

Who we might share your information with

We may share your personal information with outside organisations such as regulators or tax authorities. This is so that we can provide you with products and services, run our organisation, and obey rules that apply to us. Here we list the types of body that we may share your personal information with.

Official bodies that may include:

- OSCR
- HM Revenue & Customs, regulators and other tax authorities
- Law enforcement agencies

Your data will never be sold or passed to any third party for any other purpose.

How we keep your information secure

We have implemented security procedures, rules and technical measures to protect the personal data that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification.

All our employees and volunteers, who have access to, and are associated with the processing of personal data, are legally obliged to respect the confidentiality of our visitors' and supporters' personal data.

Changes to our privacy notice

We regularly review our privacy notice, and may make changes time to time. Any changes made will be posted on our website, and will apply from the time we post them. This privacy notice was last changed on 25 May 2018.

How to contact us

If you have any comments on our privacy notice, or information we hold about you please contact us:

by email to newhavenheritage@gmail.com;

or write to us at:-

Newhaven Heritage Centre
8 Biggar Road
Fairmilehead
Edinburgh
EH10 7BQ