

HERITAGE OF LONDON TRUST

DATA PROTECTION AND PRIVACY POLICY

This Privacy Policy describes how and when we collect, use, and share information when you make a donation, make a booking for a visit, contact us, or otherwise use our services through our website. This Privacy Policy does not apply to the practices of third parties that we do not own or control, including any third party services that they may use to store data with.

1. We are committed to protecting your personal information

Heritage of London Trust is committed to respecting and keeping safe any personal information you share with us. We use trusted services to keep your data safe, including the Egnyte cloud platform which complies with GDPR policy and is ISO/IEC 27001 certified. It provides 256-bit AES file encryption and when the files move between the cloud and your device TLS protected i.e the files are encrypted on the device and during transit. Egnyte provides MFA (Multi-factor authentication) for accounts ensuring that even if the password was breached access is prevented. We use eTapestry, provided by Blackbaud, to store donor and communications information, which also uses MFA (Multi-factor authentication).

2. Information we collect

You must provide us with certain information such as your name, email address and address for us to process donations and for us to make bookings with you. You may also choose to provide us with additional personal information which will be stored on our eTapestry database.

3. Why we need your information and how we use it

We rely on a number of legal bases to collect, use, and share your information, including:

- as needed to provide our scheme, such as when we use your information to allot a location to your visits;
- when you have provided your affirmative consent, which you may revoke at any time, such as by signing up for our mailing list;
- as necessary for the purpose of our legitimate interests, if those legitimate interests are not overridden by your rights or interests, such as providing and improving our provision. We use your information to provide the provision you requested and in our legitimate interest to improve our provision.

4. Sensitive information

If you shared with us any sensitive information, the information you have provided will be kept by Heritage of London Trust and will be treated with the strictest of confidence. It will not be shared with a third party without your consent unless we have a statutory obligation to do so, or there are concerns for your safety which Heritage of London Trust has a duty to report to the relevant authority in order for appropriate action to be taken.

If you give us personal information about another person, we expect you to be responsible for ensuring that they know we are using their personal information in accordance with this privacy policy and we will make every effort to obtain the necessary conditions for processing that data, for example if it is in our legitimate interest.

5. Information sharing and disclosure

Information about our participants is important to our work. We share your personal information for very limited reasons and in limited circumstances, as follows:

- Quotations. If you consent to give us feedback on our provision, we may use this as quotations on our website and we will write the name and organisation of the person from which it came.
- Images. HOLT events may be photographed. We display images on our website of participants to illustrate our charity and its aims.
- Donations. If you consent to being acknowledged as a supporter on our website we will share your name and organisation.

6. Compliance with laws

We may collect, use, retain, and share your information if we have a good faith belief that it is reasonably necessary to: (a) respond to legal process or to government requests; (b) enforce our agreements, terms and policies; (c) prevent, investigate, and address fraud and other illegal activity, security, or technical issues; or (d) protect the rights, property, and safety of our participants, or others.

7. Data retention

We retain your personal information only for as long as necessary to provide you with our provision and as described in our Privacy Policy. However, we may also be required to retain this information to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements.

We regularly review our processes and procedures to protect your information from unauthorised access and use, accidental loss and/or destruction.

8. Data security

We maintain the highest standards of data privacy and security to protect your personal details and other information about you because we want you to feel completely confident about engaging with us. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Transfers of personal information outside the EU

We may store and process your information through third-party web hosting services in the US and other jurisdictions. As a result, we may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If we are deemed to transfer information about you outside of the EU, we rely on Privacy Shield as the legal basis for the transfer, as Google Cloud is Privacy Shield certified.

10. Your rights

If you reside in certain territories, you have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. We describe these rights below:

- **Access.** You may have the right to access and receive a copy of the personal information we hold about you by contacting us using the contact information below.
- **Change, restrict, delete.** You may also have rights to change, restrict our use of, or delete your personal information. In the absence of exceptional circumstances (like where we are required to store data for legal reasons) we will generally delete your personal information upon request.
- **Object.** You can object to (i) our processing of some of your information based on our legitimate interests and (ii) receiving messages from us after providing your express consent to receive them. In such cases, we will delete your personal information unless we have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
- **Complain.** If you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local data protection authority.

How to contact us

If you have any questions or concerns, you may contact us at info@heritageoflondon.org

Alternately, you may send post to:

Heritage of London Trust, Fivefields, 10 Grosvenor Gardens SW1W 0DH