

## HOLT PRIVACY POLICY

Heritage of London Trust 34 Grosvenor Gardens SW1W 0DH info@heritageoflondon.org

Tel: 020 7099 0559

This Privacy Policy describes how and when we collect, use, and share information when you make a booking for a visit, contact us, or otherwise use our services through our Wix site.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including Wix or 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.

2. Information we collect

To register you with the Patrons Scheme, you must provide us with certain information such as your name, email address and home address. You may also choose to provide us with additional personal information which will be stored on an 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;
- 3. 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.

4. 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 site 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 site of participants to illustrate our charity and its aims.
- Wix. We share information with Wix as necessary to provide you our provision as the site is built with Wix.

- 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.

## 5. 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 generally keep your data for the following time period: 12 months.

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

## 6. 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.

## 7. Your rights

If you reside in certain territories, including the EU, 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 reside in the EU and 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

For purposes of EU data protection law, we, Heritage of London Trust Limited, are the data controller of your personal information.

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 34 Grosvenor Gardens SW1W 0DH