1. Information about us

http://www.thedrapers.co.uk/ is a site operated by The Drapers' Company, a City of London Livery Company incorporated by Royal Charter in 1364. The Company is the corporate trustee of seven charities and undertakes a range of philanthropic initiatives through its membership.

The Company is the "data controller" under applicable data protection legislation and is committed to protecting your personal information and respecting your privacy. If you have any queries about this Policy or how we use your personal information, please contact us using the details at <u>Contact Us</u>.

This policy sets out why we collect personal data from you or that you provide to us, and how we use it. Please read it carefully to understand how we will treat your personal data and your rights. By visiting our website you are accepting and consenting to the practices described in this Policy.

Our nominated person for data protection is the Clerk, who can be contacted using the details at Contact Us.

2. What information do we collect?

We collect personal data as defined by applicable data protection legislation ('personal information') about members, charity beneficiaries and those who hire the Hall for events.

The personal information we collect might include names, dates of birth, email addresses, postal addresses, and telephone numbers.

3. How do we collect information?

We obtain personal information from you when you use our website, enquire about our activities or services, send or receive an email, or otherwise provide us with personal information.

We record your requests for information and any feedback we receive from you.

We may record telephone calls and emails for quality assurance purposes.

We may collect information that is available in the public domain, for example: newspaper or online media items, publicly available posts on LinkedIn or social media or Companies House listings.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise the way our website is presented when users visit, to make improvements to our website and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website.

We also gather information through CCTV, which is located on the private road outside the Hall to prevent and detect crime.

4. Why do we collect personal information?

We collect your information for the purposes listed in paragraph 5 below. The lawful basis under which we process your information is as follows:

your consent;

at Contact Us.

- for the performance of a contract to which you are a party. If you do not provide this information we may be unable to perform the contract;
- to comply with our legal obligations; and
- for the purpose of pursuing our legitimate interests, except where your rights as a data subject override our legitimate interests

5. How do we use this information?

We will use your personal information:

- to process your application to become a member of the Company;
- to keep in touch with you if you are a member, including sending you information about our work and providing you with our monthly newsletter;
- to process your charitable grant application;
- to provide you with services or information you have requested;;
- to organise and manage any events being held at our premises;
- to provide you with information about future events we think may be of interest to you; and
- for administration purposes as part of our efforts to keep our site safe and secure.
 We will only use your personal information for electronic marketing purposes if we have your consent. If you agree to us providing you with marketing information, you can always opt out at a later date. If you would rather not receive marketing material from us, please let us know at any time using the contact details

If you are a member, please refer to the Members' Privacy Statement that was enclosed with your membership form for additional details about how we will use your personal information.

6. Do we share your information with anyone else?

We may need to provide your information to our contractors and suppliers to the extent necessary to enable you to receive those services.

We may also share your personal information with third parties who process your personal information on our behalf, in order to provide us with a service. For example, we use Microsoft Dynamics 365, a cloud-based customer relationship management (<u>CRM</u>) platform.

Whenever we share your information with third parties, we require that such parties respect the security of your personal information and treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes, and we only permit them to process your personal information for specified purposes and in accordance with our instructions.

We do not sell data to third parties.

If you make a payment to us we will need to share your information with our payment processor. By paying through our payment processor, you agree to accept their terms and conditions for the use of their services, including their privacy policy. You may wish to read their privacy policy when using their services as we are not responsible for data you share with them.

We may also need to disclose your information if required to do so by law or as permitted under applicable data protection legislation.

7. How long do we keep your information?

We keep your information for no longer than is necessary. We will retain your information for any period required by law, for example for compliance with HMRC requirements. Where we are not under a legal

obligation to retain your information, we will determine what is necessary by reference to the lawful basis for processing set out above and our legitimate interests. The Company maintains an archive for historical purposes. If you have any questions about how long we keep your information, please contact the Archivist.

8. How do we protect personal information?

We take appropriate technical and organisational measures to ensure that the information you disclose to us is kept secure, accurate and up to date and retained only for as long as it is necessary for the purposes for which it is used.

You should be aware that the use of the Internet is not entirely secure and although we will do our best to protect your personal data, we cannot guarantee the security or integrity of any personal information which is transferred from you or to you over the Internet. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features such as encryption to try to prevent unauthorised access.

9. International Transfers

Where we use certain service providers such as Microsoft (as set out in paragraph 6 above), we use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

10. Your Rights

You have a right to ask us to confirm whether we are processing information about you, and to have access to this information ('right of access').

You may ask us, or we may ask you, to rectify information that you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or to complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, we will correct our records.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided us with changes, for example, if you change your email address, name or payment details, please let us know using the contact details at the end of this policy.

You have a right to obtain your personal data from us and reuse it for your own purposes, without hindering the usability of the data ('right of portability'). This right does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of authority vested in us.

You have a right to ask for your data to be erased where it is no longer necessary for us to continue holding or processing your personal data and you may withdraw your consent. (often referred to as the 'right to be forgotten'). This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest. You should note that we are entitled to and reserve the right to retain your data for statistical purposes.

You have a right to ask us to restrict our processing of your information ('right to restriction') if:

- you do not think it is accurate and we need to verify whether it is accurate
- the processing is unlawful and you ask us to restrict its use instead of erasing it
- we no longer need the information for the purpose of processing, but you need it to establish or defend legal claims

- you have objected to processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we review your rights and our legitimate interests.
 - If you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons. You have a right to prevent us from processing your personal information for marketing purposes.

If you would like to exercise any of your rights above, please contact the Archivist using the details at <u>Contact Us.</u> We will act in accordance with your instructions as soon as reasonably possible and there will be no charge.

11. Cookies

Our website uses cookies to distinguish you from other users of our website. This makes it easier for you to browse our website and also allows us to improve our site. For more information on the cookies we use and the purposes for which we use them, see our Cookie Policy.

12. Changes to this policy

Any changes we may make to our Privacy policy in the future will be posted on this page and you may wish to check the website to see any updates or changes. By continuing to use our website you will be deemed to have accepted such changes.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline at 0303 123 1113.

This Privacy Policy was updated on 19 January 2021.