

# Privacy Notice Supporters, Visitors and Clients

Person(s) Responsible for the Policy:	Data Protection Officer
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#### Policy at a glance:

- This document sets out the basis on which we collect, use, and disclose personal data
  of people who donate to Ampleforth Abbey Trust, visit our premises, interact with us
  online, or hire our property.
- It also outlines your rights in respect of your personal data.

#### 1 Introduction

Ampleforth Abbey Trust and Ampleforth Abbey Trading Ltd respects your privacy and is committed to protecting your personal data and being transparent about how we collect and use it. During your relationship with the Trust we will collect, use and hold ("process") your personal data. This makes the Trust a data controller of your personal information.

This Transparency Information (sometimes known as a Privacy Notice) explains how we use the personal data that you provide, or which third parties provide to us. It applies to those who support us, including visiting our premises, and sets out how we will use that information and what your rights are.

Our Data Protection Officer (DPO) is responsible for answering any questions you have about this Privacy Notice. You may contact them at <a href="mailto:dpo@ampleforthabbey.org.uk">dpo@ampleforthabbey.org.uk</a>

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection issues (<a href="www.ico.org.uk">www.ico.org.uk</a>). We would, however, appreciate the chance to deal with any concerns you may have before you approach the ICO, so please feel free to contact us first.

We will review and may update this Privacy Notice from time to time, or provide additional information.

# 2 The personal data we collect from you, how we collect it and how we use it

This section explains what information we might collect, keep and store about you if you are one of our supporters, visitors or clients. These include people who visit our premises, stay with us, rent our property, donate, make purchases, request bookings, set up memberships and subscriptions, interact with us online or enquire about these or other similar activities.

#### 2.1 Why do we collect your personal data?

We use your personal data to:

- Deal with your enquiries, requests and complaints;
- Process your donations and orders;
- Provide you with information about our activities, products, events and services;
- Provide and personalise our services;
- Administer membership records;
- Collecting feedback;
- Conduct our campaigns, fundraise and send marketing;
- Conduct market research; and
- Administer bequests in your Will.



We need to process your data to meet our contractual obligations under any agreement with you. For example, if you make a purchase from us, rent our property or hire facilities, we need to process your data to perform the contract and cannot fulfil the contract without your data.

Often you give us your consent to process your data. For example, when you choose to subscribe to our newsletters or consent to other marketing and promotions. You can opt out at any time by clicking the 'unsubscribe' link at the end of our marketing emails or contacting us directly. We will always ask for your consent to take and display promotional photographs and video footage. We will never pass your personal data on to other organisations for them to use for their own marketing purposes. We will ask for your consent if we share your personal data with partner organisations for example, sharing images taken at joint events. We will ask for your consent for sensitive data such as health information.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to comply with safeguarding obligations, keep a register of guests, administer Gift Aid, and comply with health and safety laws. Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

In other cases, we have a legitimate interest in processing personal data. For example, we process donations, promote our charitable activities and respond to you when you make an enquiry. We use CCTV and access control door entry systems to improve the security of our premises and the personal safety of people on site. We use website analytics to understand how people use our website so that we can improve it.

From time to time we use personalisation and profiling techniques when we carry out targeted fundraising and campaign activity to ensure that we are contacting you with the most appropriate and relevant communications, for example by providing timely news about our work, and letting you know the different ways you can support us and help us to raise funds. We also use your personal data to understand the likelihood of you responding to a fundraising communication from us, and potentially donating. For example, we create supporter categories within our database and we will, where appropriate, store this information on your record. We will also use broad demographic information such as statistics and analysis from third parties to better understand how our own supporter base compares to the general population.

Some of these reasons for processing your data will overlap and there may be several grounds which justify our use of your personal information. We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### 2.2 What personal data do we collect?

Your image is personal data, so if you visit our premises you may be recorded on CCTV footage and in other footage if you attend a service in the Abbey Church. Other personal data we collect includes name, address, email address, telephone numbers, age, date of birth, location, gender, contact preferences and consents.



If you are staying with us, we collect emergency contact details and information about identity documents, as well as information about events you're taking part in, and access to facilities. We collect sensitive information, such as about your health, religious beliefs or criminal convictions and offences, to ensure we provide you with appropriate facilities or support.

If you donate to us or intend to leave us a gift in your will, we collect data including your gift aid status, fundraising status, reason for donating, organisation name, referees, details of executors and beneficiaries and your family relationships. In some cases we collect sensitive information about criminal convictions and offences to help us perform due diligence checks to ensure we are not being abused by fraudsters or criminals posing as genuine donors, or to ensure that there are no conflicts of interest from potential supporters or organisations prior to our engagement.

If you use your credit or debit card to donate to us, buy something, or pay for a registration online or over the phone, we will ensure this is done securely. We do not store your credit or debit card details: following completion of your transaction, all card details are securely destroyed.

We also gather general information about the use of our websites such as pages visited and areas that are of most interest to users.

In certain circumstances, third parties supply information to us. Usually they provide appropriate evidence that you have agreed your personal data may be shared with other organisations, but sometimes this may be without your knowledge or consent, for example in relation to criminal convictions. Occasionally we research or obtain publicly available information.

#### 2.3 How long do we keep your personal data?

We keep your personal data for as long as required to meet legal requirements and tax and accounting rules. Where your information is no longer needed, we will ensure it is destroyed in a secure manner. This will generally be within seven years of your last contact with us unless you have told us you intend to make a bequest in your will.

## 3 Sharing your data and transfers to other countries

We share your personal data with third parties who provide services on our behalf ("data processors"), business partners and suppliers, including:

- Payment and donation websites
- Photographers, videographers, printers, creative agencies, and online survey providers
- Our IT suppliers
- Insurers, solicitors, brokers, loss adjusters or managing agents
- Fraud protection and credit risk reduction organisations.

Where we are under a duty to disclose or share your personal information to comply with any legal obligations, where the disclosure is 'necessary' for purposes of national security, taxation, and criminal



investigation, we will share your data with authorities, agencies, and statutory bodies, including the Charity Commission and external auditors or inspectors. We will share your information with other bodies to enforce or apply agreements, or to protect the rights, property, or safety of the organisation, our donors, beneficiaries, or others.

The data that we collect from you may be transferred to, and stored in, a location outside of the United Kingdom (UK) Whilst we process your data within the UK or the European Economic Area, some of these other organisations run their operations outside the UK in countries that may not provide the same standard of data protection as the UK. Your data may also be processed by staff operating in these locations who work for our service providers. In these instances, we will take the necessary steps to make sure appropriate protections are in place (in accordance with UK Data Protection Law) and that your information is safeguarded.

Our website may contain links to other websites that are not operated by Ampleforth Abbey. Whilst we try to link to sites that share our high standards and respect for privacy, we are not responsible for the content, security or privacy practices of those websites. You should view the privacy and cookie policies displayed on those websites to find out how your personal data may be used.

#### 4 How do we keep your data safe?

We take the security of your personal data very seriously. We have internal policies, controls, and security measures in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our people in the proper performance of their duties.

## 5 Your legal rights

You have the following rights in relation to your personal data:

- The right to be informed about the data we hold and share about you. This Transparency Information/Privacy Notice and any specific information we provide to you gives you this information.
- The right to access your personal data. By making a subject access request you can find out what personal data we hold about you, why we hold it and who we disclose it to. You can make a subject access request to us in writing. We may require you to provide proof of your identity.
- The right to **edit and update your personal data**. Please keep us informed if your personal data changes during the duration of your relationship with us.
- In certain cases, the right to request to have your personal data deleted.
- In certain cases, the right to **restrict processing of your personal data**.
- The right to **data portability**, i.e., to receive a copy of the personal data you have provided to us in a way that is accessible and machine-readable, for example as a csv file, and to request the transfer of this data to another organisation where technically feasible.
- The right to object to our processing.



If you wish to exercise your rights, please contact our Data Protection Officer (<a href="mailto:dpo@ampleforthabbey.org.uk">dpo@ampleforthabbey.org.uk</a>) providing as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 30 days before they take effect. Once we have received your request, and verified your identity, we will respond within one month, unless a longer period is permitted by applicable law, such as where the request in question is complex.

