

Privacy policy

At Hartlebury Castle Preservation Trust, we are committed to protecting and respecting your privacy.

This page explains when and why we collect personal information and how we endeavour to repay the trust you have shown in sharing your personal data with us. It applies to you if you're a visitor, member, donor, applicant, employee, volunteer, business contact or if you visit our website, email, call or write to us.

Who are 'we'?

In this policy, whenever you see the words 'we,' 'us' or 'our', it refers to Hartlebury Castle Preservation Trust (HCPT), a registered charity (no. 1127871) and limited company (no. 06779241) and Hartlebury Castle Company Limited, a limited company (no. 09248664).

HCPT is registered with the Information Commissioner's Office under the Data Protection Act 1998, and our Data Protection Register number is: ZA372273

What information do we collect about you?

When you interact with us:

We collect the personal data that you give when you interact with us, for example booking a ticket, joining as a member, making a purchase, completing visitor surveys, booking room hire or communicating with us. If you do not provide us with the requested personal information we may not be able to properly perform our contract with you, for example we may not be able to issue event tickets purchased by telephone without access to your personal address.



The information will be retained for contractual and legitimate business interest reasons and may comprise:

- Personal details (name, date of birth/age, gender, email, address, telephone number and where necessary family and spouse/partner details and ethnicity)
- Financial information (payment information such as credit or debit card, direct debit or standing order details)
- Interaction history (ticket history, attendance history)
- Details of correspondence sent to you, or received from you and your opinions about HCPT

When you get involved with us:

We collect details of how you get involved with us, whether that is by volunteering with us, working for us, through a school, college or university placement scheme, donating funds or items to our collection or helping with our fundraising and marketing campaigns and activities. This information will be retained for legitimate business interest reasons.

If you volunteer with us we will collect additional information about you. This may include references, medical conditions, past experience, qualifications, details of emergency contacts, and bank details to pay expenses. This information will be retained for legal or contractual reasons.

We will also collect extra information about you if you apply to be an employee of the HCPT. We will ask you about your previous experience, education, qualifications, referees relevant to the role for which you have applied. You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. Any information you do provide, will be used only to produce and monitor equal opportunities statistics, so, for example, to monitor barriers to employment.

If you progress to become an employee of HCPT or HCCL, further information relating to health and criminal convictions and bank account



details will be sought. This information will be retained for legal or contractual reasons.

If you make a financial donation to us, we'll keep records of how much you give to a particular cause and we'll note anything relevant that you may tell us. This information will be retained for legitimate business interest reasons.

If you make a donation to our collection, then we'll keep records of you, your contact details, the item donated and anything relevant that you may tell us. This information will be retained for legitimate business interest reasons.

What do we do with your information?

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 policy.

If you have interacted with us, for example as a visitor or Member:

We will send you essential communications, regardless of your contact preferences, deemed necessary to fulfil our contractual obligations to you. If you book a ticket or a room hire, this would be information related to your booking.

Or, if you are a Member we will communicate with you about items such as Standing Order or Direct Debit payments, Member benefits, renewal reminders, and querying returned mail or bounced payments with you. We will also send you communications about the activities of HCPT and HCCL, the programme of events, and other news and ways in which you can support our work.

We will use tools to monitor the effectiveness of our communications with you, including email tracking, which records when an e-newsletter from us is opened and/or how many links are clicked within the



message. The data from this tracking is used in an aggregated and anonymised form.

If we contact you by email, every message we send you will include a link to opt-out of receiving future messages if you change your mind. If we contact you by other means and you want to change how – or if – you receive our communications, please email:
admin@hartleburycastle.com

We may also use anonymised personal data to carry out research on the demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them and to enable us to improve our service. This research may be carried out internally by our employees or we may ask another company to do this work for us.

If you are involved with us as a financial donor:

All of the above apply. We will also send you thank you letters and invitations related to the work you have supported.

If you are involved with us as a donor to our collection:

We store your name, your contact details and anything relevant that you may tell us against the record of the item donated.

If you are involved with us as an employee or prospective employee:

We need to process personal data from job applicants and employees to comply with our contractual, statutory, and management obligations and responsibilities.

All the information you provide during the application process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes. The information you provide will be held securely by us whether the information is in electronic or physical format.



We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role for which you have applied. You don't have to provide what we ask for, but it might affect your application if you don't.

If you are involved with us as a volunteer or through a school, college or university placement scheme:

We need to use your personal data to manage how you are involved with us, for example, as a volunteer, to contact you about an expense claim you've made or to recognise your contribution or to advise you of new opportunities.

How do we keep your information up to date?

If you have interacted with us, for example as a visitor or Member:

We need to ensure your data is as accurate as possible and therefore we really appreciate it if you let us know if your contact details change.

We will also update bank details, if we are notified by your bank that details linked to Direct Debits or any outstanding payments due to us have changed and would therefore affect these payments.

If you are involved with us as a volunteer, worker or employee:

We ask that you keep us up to date if any of your personal details change.

Who might we share your information with?

We do not disclose personal data to any third parties or external organisations, other than data processors carrying out work on our behalf unless we are legally and/or contractually required to do so, e.g.



by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court.

Examples of data processors carrying out work on our behalf would be, for employees, our payroll provider. Data processors will act only on our instructions.

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

How do we keep your information secure?

If you have interacted with us, for example as a visitor or Member

As a visitor or supporter of HCPT, any personal data you provide will be held securely and will only be accessed by staff and used for the purpose for which you provided it.

If you are involved with us as a donor:

As a donor, your personal data will be held and processed against the record of the donation.

Your data is always held securely with access strictly controlled. The system can only be accessed by people who need it to do their job.

If you are involved with us as a volunteer, worker or employee:

As a volunteer or employee your personal data is kept across several different electronic and hard copy systems to meet the business needs of HCPT. HCPT has policies and procedures in place to ensure that your information is only accessible by individuals that need it to do their job.

Certain data, for example some sensitive information, is additionally controlled and is only made visible to members of staff who have a reason to work with it. However, there will be other data, for example HCPT email addresses and job titles, which is accessible to all staff and will be in the public domain.

If we use external companies to process any volunteer or employee data on our behalf, we do comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collect or have access to.

For how long do we keep your information?

We will only use and store your data for as long as it is required for the purposes it was collected. The period of retention depends on the information being held, what it is being used for and in some cases, legal requirements.

We keep a retention of records policy detailing all this information. When we no longer need to store your data, we will always dispose of it securely.

How can I access the information about me, and/or correct or delete 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 (SAR).

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 require including where the data is likely to be held and the date range of the information you wish to access.

Once we have received your SAR, and proof of identity, you will receive a response from us within 30 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.

A Subject Access Request should be sent to:

admin@hartleburycastle.com

At any time, you may request that we correct or delete your personal information - which we will do providing there are no legitimate, legal reasons (as outlined in the general data protection regulation) for us to retain and process that data, for example if it's necessary for us to carry out the purpose for which you have provided it to us. In either of the above circumstances, please contact admin@hartleburycastle.com

For further information see the [Information Commissioner's guidance](#) on the [Information Commissioner's Office website](#).

Other important information

Children's data

Some of the services we offer may be aimed specifically at children and to deliver these services effectively it may be necessary for us to collect data such as name, age, emergency contact details, and any relevant medical information. We will only store this information until the services are fulfilled upon which the data will be deleted. Before we collect data from anyone under 16 we will always ask them to obtain the permission of a parent or guardian before giving it to us.

We will not send marketing communications to children under 16.

Closed Circuit Television (CCTV)

We use CCTV equipment to provide a safer, more secure environment for visitors and staff and to prevent vandalism and theft. It is used for:

- The prevention, investigation and detection of crime.



- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, members and staff safety.
- Monitoring the security of our premises.

Access to the CCTV recorded footage is limited to designated staff and other authorised personnel (including Police) with a legitimate reason to view and/or otherwise use the captured footage, including the provision of evidence in support of prosecution of criminal or illegal behaviour. Authorisation to review any footage will be given to relevant parties on a case by case basis which will be determined at the discretion of the General Manager, Site Manager or Chair of Trustees in accordance with applicable data protection legislation.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than 30 days.

However, where a law enforcement agency is investigating a crime or information is required for an insurance claim, images may need to be retained for a longer period.

Photography & videography

If you're a visitor to Hartlebury Castle we may ask you to participate in photography and/or videography for marketing activity including on our website, on our social media channels, in our leaflets and posters. If you are not happy to participate, we will not use your images. For visitors under 16 years of age, we will ask a parent or guardian to sign a model release form giving us permission to use images.

If there is photography and/or videography taking place at Hartlebury Castle in which a visitor might be inadvertently and unidentifiably photographed and/or filmed, we will make the photography and/or videography known at the point of admissions and direct visitors to this notice.



Links to third party websites

Pages on the HCPT website may include links to third party websites that we believe might be of interest to our website visitors. This privacy policy only governs our website and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website, we recommend you read the privacy policy of that website before sharing any personal or financial data.

Use of ‘cookies’

Like most websites, we may receive and store certain details whenever you use our website. We may use “cookies” to help us make our site – and the way you might use it – better. Cookies mean that a website will remember you and enable online transactions. It can also help us understand how you use our website, where we can make improvements and how best to tell our audiences about events they might be interested in.

Social media

We use social media (including Facebook, Twitter, Instagram and YouTube) to broadcast messages about our news and events. Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

Changes to our privacy notice

We regularly review our privacy notice and may make changes from time to time. Any changes made will be posted to this page and will apply from the time we post them. This privacy notice was last updated in June 2018.



How to contact us

If you have any comments on our privacy notice, or information we hold about you please contact the Information Governance Officer at the address given above or via email at admin@hartleburycastle.com



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