

# Privacy policy

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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 it is used. It applies to you if you've interacted with Hartlebury Castle Preservation Trust, either through our website, social media or written and verbal communication.

## Who are 'we'?

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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?

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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, liking or sharing a social media post 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, email, address, telephone number)



- Protected characteristics (age, sex, race, sexual orientation, disability, religion, marital status)
- Financial information (payment information such as credit or debit card, direct debit or standing order details)
- Interaction & involvement history (ticket, attendance, donation – financial or collection - history)
- Details of correspondence sent to you, or received from you and your opinions about HCPT or HCCL
- Your image may be recorded on our CCTV
- Survey responses and comments
- 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.
- If you make a donation to our collection, then we'll keep records of the item donated and anything relevant that you may tell us.

## 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.

We may use your information to:

- Send you essential communications deemed necessary to fulfil our contractual obligations to you. (eg Information about your booking)
- To contact you about financial items such as Standing Order or Direct Debit payments, Member benefits, renewal reminders, and querying returned mail or rejected payments with you.
- Process payments for bookings and subscriptions
- Where you have opted in, to send you information about activities of HCPT and HCCL, special offers, the programme of events, and other news and ways in which you can support our work.
- We 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.

- Send you a thank you message for a donation or matters in relation to your donation.
- To record provenance of an item donated.
- To ensure reasonable adjustments are in place as required

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.

In mass communications, 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](mailto:admin@hartleburycastle.com)

### How do we keep your information up to date?

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.

### Who might we share your information with?

We do not disclose personal data to any third parties or external organisations, other than where it is necessary to fulfil the contract with you or 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.

If you are enquiring about a wedding, we will share your name, email address and telephone number with our wedding co-ordinators Country House Occasions to facilitate your enquiry being answered, arranging a viewing and co-ordination of your wedding.



On occasion, under exceptional circumstances, where a gift voucher may have been purchased as an anonymous present, we reserve the right to provide the recipient with your name for safeguarding on their request.

Our website links to other websites owned and operated by certain trusted third parties to take payments for purchases. These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

We work in collaboration with Museums Worcestershire to operate Hartlebury Castle. On occasion we may share data such as your name, phone number or email with them, to facilitate essential communication and fulfilment of contract. Photos/videography may also be shared for publicity purposes as stated on the model release form (see below for more information).

Other instances where we may share your data to complete our contracted service include sharing your address with delivery companies, or where we have appointed a third party to carry out work including market research or communicating with audiences on our behalf. Where this occurs, 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.

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

### How do we keep your information secure?

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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.

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.

### 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

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#### Children's data

Some of the services we offer may be aimed specifically at children (under 16yrs) 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 obtain this data, only from a parent or guardian aged over 18. We will only store this information until the services are fulfilled upon which the data will be deleted.

We will not send marketing communications to children under 18.

#### 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 Director 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.

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 attending Hartlebury Castle we may ask you to participate in photography and/or videography for project records, evaluations to be sent to third party funders or marketing activity including on our website, on our social media channels (Facebook, Instagram, Twitter, Youtube), in our leaflets and posters. You may be asked to complete a model release form. 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. As stated on the model release form, photography and videography may be shared with Museums Worcestershire for cross organisation publicity such as our annual leaflet or an event.

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, our audience demographic, 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

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We regularly review our privacy notice and may make changes from time to time. This privacy notice was last updated in February 2022.

### How to contact us

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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](mailto:admin@hartleburycastle.com)

