

## Buckinghamshire Culture Privacy Policy

### Privacy statement

Buckinghamshire Culture (registered charity number: 1196317) is committed to protecting your personal information within the guidelines set out by law. We abide by the General Data Protection Regulation (GDPR) and other applicable laws, and best practice guidance. The principles of how we protect and manage your data are set out below.

### The information we collect

Buckinghamshire Culture may collect personal information about you. We do this to support and enhance your experience of engaging with us. The situations when we may collect personal data include:

- Consenting to receive information and updates
- Enquiring about our activities and services
- Engaging with us via social media
- Booking a ticket
- Becoming a member
- Making a donation
- Providing survey responses

We may also gather and retain data about the use of our website and social media accounts to help us improve how we engage with audiences. This data is aggregated or anonymous and does not identify individual visitors to our website.

We review the personal information requested to ensure that we only collect data relevant to the use for which it is being collected. We only collect 'sensitive personal data' when there is a clear reason to do so.

### Legal basis

There are three legal bases under which we may process your data.

**Contract purposes:** When you sign up to one of our programmes or make a donation, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example, we may need to contact you by email or telephone in the case of cancellation of a course, or any problems with your payment.

**Legitimate interest:** In certain situations we collect and process your personal data for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information this way.

**With your explicit consent:** For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

### How we store and manage personal data

We will securely store and manage your personal data for the uses set out below. All records are digital and held on a secured network.

We may use this data to:

- Keep you up to date on our projects and services
- Invite you to meetings and events
- Send you our Newsletter
- Seek your views or feedback.

### **What Buckinghamshire Culture does with the data collected and stored**

Your personal data may be used for the following purposes:

- To provide you with services, products and information
- For customer service or administrative purposes
- For internal record keeping, including management of complaints or feedback
- To target communications and messages to you
- To invite you to participate in opportunities, surveys and research
- To use your IP address to analyse website engagement and use
- To analyse and improve the services we offer
- Where it is required or authorised by law.

### **How long do we keep your data?**

If you are not a member of our network, we will keep your data for up to two years. If you are a member, we will keep your data for as long as you wish to be part of Buckinghamshire Culture, and if you wish to cease to be a member and request that we delete your data, we will do so.

Buckinghamshire Culture also holds data relating to stakeholders or people connected to the partnership with a legitimate reason for staying on our database. Their details will be kept until such time as their involvement ceases. Once their involvement ceases their details will be automatically removed unless they specifically request to stay on the database.

We reserve the right to use any photographs/videos taken at Buckinghamshire Culture events (or events at which Buckinghamshire Culture is a partner or participant) in our print and digital marketing. All files will remain in our digital archive of usable material until such time we receive a request to remove them. Digital copies will be removed within 7 days of request being received.

### **Website and cookies**

Cookies are small text files placed on the computer's hard drive by the web browser, which allow information to be stored until it is needed. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

Buckinghamshire Culture uses google analytics to gather information and it is used to improve marketing, communications, services and also to see how the website itself is used and can be improved.

Website related rights and conditions set out in this Privacy Policy apply to all websites created and controlled by Buckinghamshire Culture. Buckinghamshire Culture's website may include links to other websites. Buckinghamshire Culture does not accept any responsibility or liability for the privacy policies of

such third-party websites and use of these websites is at your own risk.

### **Marketing and targeted advertising**

In consenting to receive information and updates from Buckinghamshire Culture, you agree to be contacted for marketing purposes. You may adjust or opt-out of communications for marketing purposes at any time by clicking the unsubscribe button on the Newsletter. We use Mailchimp to prepare and send our Newsletter, which is GDPR compliant.

### **Surveys**

Buckinghamshire Culture undertakes surveys to enable us to improve our work and research future projects. Data collected in these surveys is regularly monitored to ensure that its collection is compliant with GDPR obligations. These surveys will be collected digitally and all survey responses will be aggregated and anonymised for storage and usage.

### **Information sharing**

Buckinghamshire Culture is a partnership working closely with Buckinghamshire Council; therefore, your information may be shared with this partner if required for monitoring or in pursuit of partnership. Members' names and contact information will be shared within the membership in pursuit of partnership. We may disclose your personal information to third parties if we are under a legal obligation to do so. Where information is shared, we will ensure that your data is held in compliance with GDPR and will take all steps reasonably necessary to ensure that your data is kept secure and in accordance with this Privacy Policy.

When Buckinghamshire Culture works in partnership with another organisation (other than the party outlined above) to deliver its programmes, we may ask for your consent to share personal data with the partner organisation.

### **Privacy Policy updates**

We may update the terms of this policy at any time. We ask, therefore, that all users check for updates from time to time. The date of the latest update will be clearly stated at the end of the policy. We will notify you of any significant changes in the way we collect and manage your personal data. This will be done by displaying a notice on the Buckinghamshire Culture website for four weeks following any update and by sending an update notice to the primary email address for users registered with us via email. By continuing to engage with Buckinghamshire Culture through our services and website following an update, you will be deemed as having accepted the changes to the Privacy Policy.

### **Your choices regarding your personal data**

In using Buckinghamshire Culture services, you agree that any information you give to Buckinghamshire Culture is accurate and kept up to date.

You can unsubscribe or amend your consent options at any point using links contained in Buckinghamshire Culture communications materials, or by emailing [lallie@buckinghamshireculture.org](mailto:lallie@buckinghamshireculture.org)

You have the right to request a copy of the personal information Buckinghamshire Culture holds about you and to have any inaccuracies amended. We ask that all such requests are made in writing using the above



contact details. A small administrative fee, to a maximum of £30, may be charged to cover the costs of this work.

### **Review Dates**

**Last Review: 1<sup>st</sup> March 2022**

**Next review date (every two years): March 2024**