

# PRIVACY NOTICE

## Purpose of this Privacy Notice

We are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop a better understanding of our customers and in turn to provide you with relevant and timely information about the work that we do. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this notice is to give you a clear explanation about how we (and our subsidiaries) collect and use the information we collect from you directly and from third parties.

We use your information in accordance with all applicable laws concerning the protection of personal information. This notice explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Our use of cookies to improve your use of our website
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it

If you have any queries, please contact Andrew Churchill, the Data Protection lead at Pallant House Gallery or email [privacy@pallant.org.uk](mailto:privacy@pallant.org.uk)

## Who we are

Pallant House Gallery is a charity and is funded by Arts Council England, Chichester District Council, various trusts, foundations and individual donors and supporters. Our registered charity number in England and Wales is 1102435 and we are registered as a company limited by guarantee in England and Wales under registration number 05045130.

The Friends of Pallant House Gallery, previously an independent charity, has merged with Pallant House Gallery as of 1 April 2018. Memberships and the associated personal data of the Friends of Pallant House Gallery have transferred to Pallant House Gallery.

Pallant House Gallery Services Ltd is a company that operates to manage income from various commercial activities. We are registered as a company in England and Wales under registration number 05526158.

## What information we collect about you

We collect various types of information and in a number of ways:

### Information you give us

For example when you register on our website, buy tickets or make a donation, we'll store personal information you give us such as your name, email address, postal address and telephone number. We will also store a record of your purchases and donations. You may be asked to give your personal information on a feedback form or comments card.

## **Information about your interactions with us**

For example, when you visit our website, we collect information about how you interact with our content. When we send you a mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on.

We may choose to find out more about you, using publicly available sources, on an individual basis, in order to tailor our relationship with you.

## **Sensitive personal data – also known as “special categories of personal data”**

Data Protection law recognises that certain categories of personal information are more sensitive such as health information. For nearly all our activities we do not collect data that is classified in this group. The exception to this is our pioneering Community Programme which provides people with disabilities, health issues and those who are isolated with meaningful and long-term opportunities to increase their confidence and improve their health through their interest in art. For the Community Programme, where appropriate, we ask people to share their health information with us in order to support them. Participants can opt out of providing this information at any time.

## **How we might use your information if you make a purchase from us, are a supporter who receives marketing materials or makes donations**

### **Processing your admission ticket, purchase or donation**

When you buy an admission ticket, book for an event, make a purchase, 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 an event, or in the case of problems with your payment.

If you choose to include [Gift Aid](#) with a donation to us, then we will also ask for your address and UK taxpayer status as this information is required by law. Information associated with Gift Aid declarations must be retained for 7 years. This information will be shared with HMRC for tax regulation purposes and may also be shared with the Fundraising Regulator and the Charity Commission in the event of an enquiry.

### **Analysis & Insight**

We may use your data to understand more about our visitors – for example, analysing what types of tickets people purchase, mapping the postcodes of our visitors, understanding those people who are more likely to donate to us and grouping our data into different segments in order to help understand who is engaging with our work. We may use this information to generate insight reports which can be shared with our funders and supporters – these reports will not include personal data.

### **Marketing communications**

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

Sending emails is one of our main ways of communicating with you and we include a variety of information in our emails including news, exhibition information, activities and fundraising appeals. We will provide you with an option to unsubscribe in every email that we send you, or you can alternatively use the contact details at the end of this policy.

Where you have provided your postal address or telephone number we may send this information to you by post or by calling your telephone unless you have asked us not to. If you would like to opt out of information at any time please contact us using the details at the end of this policy.

We will keep your personal information for no longer than is necessary for the purposes for which it is processed. If you ask us not to contact you, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

### **Responding to enquiries**

If you contact us then we will keep a record of this correspondence and any associated documents so that we have the information available in the event of a follow-up.

### **Notifying you of changes**

If we make significant changes to our privacy notice or policies which may affect you, we will use your contact details to inform you of the changes.

### **Other processing activities**

We may analyse data we hold about you in order to identify and prevent fraud.

### **Your debit and credit card information**

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

We optionally allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS and in a way where none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

## **Who Pallant House Gallery shares personal information with and why**

We will never share your details with other organisations to use for their own purposes, other than where we are required to by law. Pallant House Gallery will not share or sell your personal information to any third party for marketing purposes and you will not receive offers from other companies or organisations as a result of giving your details to us.

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

To the subsidiaries described above when it is necessary for them to be able to provide you with products or services that you've requested.

To our own service providers who process data on our behalf and on our instructions (for example our ticketing system software provider or a company who manages our postal mailings). To our own research service providers who process limited personal and sensitive data (such as postcode and demographic information), submitted voluntarily by those that consent to take part in our visitor surveys. In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.

Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

Certain third party organisations collect information on our behalf as well as for their own use. We may receive your personal details from other organisations for our marketing purposes where you have consented for this information to be shared, for example [Donate](#). These organisations have their own data protection and privacy policies and we urge you to make yourself aware of these before signing up.

We may also use other companies to provide services and process your personal information on our behalf, including delivering postal mail, sending emails, processing credit card payments and analysing our supporter information as outlined above, to help us offer you communications that are most appropriate to you and your interests. In some cases, our suppliers may use software which analyses publicly available information (as outlined above) to build up a picture about you.

## **How we might use your information if you have visited our websites**

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well to provide website operators with information on how the site is being used.

When you access our websites, some cookies are saved to your computer, for example if you have chosen a particular language setting or created a user account. You can also turn off your cookies so that we can't access that information.

You can find out more in our website and cookies notice [here](#).

## **How we might use your information if you are applying for a role within Pallant House Gallery**

Pallant House Gallery is the data controller for the information you provide during the recruitment process. This section includes the application process for voluntary roles with us. If you have any queries about the process or how we handle your information please contact us.

### **What will we do with the information you provide to us?**

All of the information you provide during the 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 or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors 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 you have applied for.

### **What information do we ask for, and why?**

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for employment.

### **Recruitment Agencies**

For certain roles we may use recruitment agencies. These agencies will ask for your personal data in the course of the process – please review their privacy notices at this stage. The recruitment agencies we use include; CMA Recruitment Group, Harvey John Limited.

### **Application stage**

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

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. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

### **Conditional offer**

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

### **Final Offer**

On acceptance of a final offer we would ask you for the following:

Bank details – to process salary payments

Emergency contact details – so we know who to contact in case you have an emergency at work

Start date

### **How long is the information retained for?**

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 12 months from the closure of the campaign. Information generated throughout the assessment process, for example interview notes, is retained by us for 12 months following the closure of the campaign. Equal opportunities information is retained for 12 months following the closure of the campaign whether you are successful or not.

### **Transfer of personal information outside of the EEA**

We will not transfer, process or store your data anywhere that is outside of the European Economic Area.

### **Maintaining your personal information**

We store your personal information for as long as is justifiable according to the nature of your relationship with us.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

## **Security of your personal information**

Pallant House Gallery protects your personal information in a range of ways including secure servers, firewalls, password controlled access to our systems and SSL encryption. We follow payment card industry (PCI) security compliance requirements when processing credit card payments.

## **Children's information**

Where appropriate, we will ask for consent from a parent or guardian to collect information about children.

## **Your rights to your personal information**

### **How to request copies of all the information we hold about you, otherwise known as a Subject Access Request**

You have the right to ask for a copy of all of the information related to you. You can request this using the contact details at the end of this policy.

### **How to ask us to amend or delete your information**

You can let us know if your information is incorrect, out of date, or you wish for your data to be deleted by using the contact details at the end of this policy.

### **More Information**

You can find out more about your data protection rights on the Information Commissioner's Office ([ICO](#)) [website here](#).

This policy was last updated in April 2018. Pallant House Gallery reserves the right to make alterations from time to time. Please check this website for the latest version.

## **Contacting Us**

If you would like us to update the information we hold, change the way we contact you or you have any other questions about this privacy notice please use the contact details below:

### **Andrew Churchill, Deputy Director**

Pallant House Gallery, 9 North Pallant, Chichester, PO19 1TJ

[privacy@pallant.org.uk](mailto:privacy@pallant.org.uk)

01243 770847