

# Data Protection Policy

## HISTORIC HOUSES FOUNDATION (HHF)

Information Commissioner's Office Registration number: Z9149907

Date registered: 16 August 2005

Last updated	11 May 2022
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### Definitions

<b>Charity</b>	means HHF a registered charity. Registration no. 1111049
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means the HHF Secretary to Trustees.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

#### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **2. General provisions**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

#### **4.1 Information provided for the purposes of administering grants/ training**

If you/your organisation contact us regarding or to apply for a grant, we will collect personal data about you and other people connected to the grant application.

If you provide us with personal data of people who benefit from your project's work it is your responsibility to inform those individuals and if they have any questions about our use of their personal data, you must refer them to this notice.

#### **4.2 Using publicly available information for fundraising activities**

The HHF wishes to develop collaborative relationships with donors, influencers, prospective donors and others so that together we can continue, and improve, our support of restoration projects in England and Wales.

To enable us to find and connect with people with a passion for architectural restoration and the interest and ability to support us in new and exciting ways, we may also use the information you provide to us in combination with publicly available information.

The purpose of processing your information in these ways is to help us to determine whether and in what ways you might be interested in getting involved with HHF including assessing how likely it is that you would be interested in donating to us and the level of donation that you may be able to give, as well as to ensure we contact you responsibly in a sensitive way. This enables us to fulfil our legitimate interest of knowing our donors and maximising the impact of our charitable resources, while being mindful of your interests and privacy rights.

We will also only store and use this information for as long as it is relevant for its specified purpose. We will always give you a chance to decline further engagement with our organisation.

To opt out of your information being used for these purposes please contact us at [info@historichousesfoundation.org.uk](mailto:info@historichousesfoundation.org.uk)

### **5. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to

what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

## **10. Cookie policy**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Our website is built and hosted by Wix. Wix uses the following essential cookies on their sites.

<b>Cookie Name</b>	<b>Purpose</b>	<b>Duration</b>	<b>Cookie Type</b>
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	12 months	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	Session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.X	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional

In common with many other websites we use Google Analytics. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This information helps us in better understanding what sort of information we should put on our website. We do not collect or store your personal information (e.g. your name or address), just the IP (Internet Protocol) number of your

computer, so this information cannot be used to identify who you are. We do not allow Google to use or share our analytics data.

The following cookies are set by Google Analytics:

Name	Typical Content	Expiry
_utma	- randomly generated number	- 2 years
_utmb	- randomly generated number	- 30 minutes
_utmc	- randomly generated number	- when you close your browser
_utmz	- randomly generated number and information on how the site was reached (e.g. direct or via a link, organic search or paid search)	- 6 months
_utmxx	- randomly generated number	- 2 years
_utmx	- randomly generated number	- 2 years

If you do not wish to accept cookies on to your computer you can disable them by adjusting the settings on your browser. However this may make some aspects of our website, and other websites, harder to use and in some cases may mean you are unable to use certain sections. For more information about Google Analytics visit the [Google Analytics website](#).

### **Links to third party websites**

This Privacy Policy applies solely to the personal data collected by the Charity and does not apply to third party websites and services that are not under our control. We cannot be held responsible for the privacy policies of third party websites and we advise users to read the privacy policies of other websites before registering any personal data.

### **Securing your personal data**

We recognise that many people have concerns about providing personal information online and we work hard to ensure that your data is kept safely and securely at all times. These are the measures that we take to secure your information whilst using our web-based services.

- We use encryption both when your information is moving to or from our web services and also whilst your information is held by us.

- Our web pages use only a secure, encrypted https format (identifiable by the padlock in the address bar of your browser). This provides you with confidence that your communications are safe and carried out directly with an authentic Historic House website and web server.

## **11. Contact and complaints**

If you have any queries about this Privacy Policy or how we process your personal information, or if you wish to exercise any of your rights under applicable law, you may contact the Secretary to Trustees

by email: [info@historichousesfoundation.org.uk](mailto:info@historichousesfoundation.org.uk)

by telephone: 01453 547124

or by post: Sheephouse Farm, Uley Road, Dursley, Gloucestershire GL11 5AD

If you are not satisfied with how we are processing your personal information, you can make a complaint to the Information Commissioner. You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at [www.ico.org.uk](http://www.ico.org.uk)

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Historic Houses Foundation  
Sheephouse Farm  
Uley Road  
Dursley, Gloucestershire  
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Charity No. 1111049