

## Compton Verney Privacy Policy

This Privacy Policy (together with our [Terms & Conditions](#)) tells you who we are and what to expect when Compton Verney collects any personal data about you. Your personal data is information about you from which you can be identified (either directly or indirectly).

Please read the following carefully

The privacy notice applies to information we collect about:

- Visitors to our digital channels (e.g. website)
- People who use and support our services

The notice provides information on:

- How we use your personal information
- Your rights to access and correct the information we hold about you
- How to contact us for queries or complaints about our use of your personal information, and to unsubscribe from marketing communications

### INFORMATION ABOUT US

The website available at <http://www.comptonverney.org.uk> ("the Site") is owned by Compton Verney House Charity (referred to in this Privacy Policy as "our", "us" or "we"), a charity registered in England and Wales with charity number 1196705, with our registered office (and main trading address) at Compton Verney House, Compton Verney, Warwickshire, CV35 9HZ.

For the purpose of the UK General Data Protection Regulation we are a data controller, which means we are the entity responsible for the protection of your information.

Our data protection registration number is ZB312892.

### INFORMATION WE COLLECT ABOUT YOU

We may collect and process information that you provide to us via the website. This is information that you give to us by entering information via our website, our social media pages or by corresponding with us by phone, email or otherwise. This includes information you provide when you complete a purchase, become an annual pass holder or member, enter a competition or complete a survey. The information you give us may include your name, address, contact details (such as email address and phone number), enquiry details, opinions you share with us and, in some instances, financial and credit card information including Gift Aid eligibility.

When you visit the Site we may automatically collect the following information to carry out legitimate business interests:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- Information about your website visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page Interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page.

We collect some of this information on our website by using cookies. This helps us to distinguish you from other users, and to improve its functionality to provide you with a good experience. For detailed information on the cookies we use and the purposes for which we use them, see our [Cookies Policy](#).

## HOW WE USE YOUR INFORMATION

The following table sets out the purpose for which we use the information we have collected from you, and the legal basis for this.

<b>Purpose</b>	<b>Legal Basis</b>
Deal with questions, queries, complaints etc	Legitimate interests - it is a legitimate interest of ours that we deal with any questions, queries or complaints made by individuals, and it is a legitimate interest of the individual that we respond.
Provide goods or services - such as the annual pass	Contract - when providing goods or services to you, we are entering into a contract with you, and we will use information for the purpose of fulfilling that contract.
Financial and regulatory requirements that apply to the charity	Legal Obligation - the charity is subject to a number of legal obligations and regulation by the Charity Commission. We may need to use the information that you have provided to comply with these obligations - such as to comply with rules around tax, or to provide information to the Charity Commission
Provide you with details of other goods and services that we offer, that we think might interest you	We use consent for this, and will only contact you if you have indicated that you are happy for us to do so.
Carry out an analysis of your interactions with us to better understand our supporters, and to provide more relevant mailings	It is a legitimate interest of ours that we understand who our supporters are, and what they are interested in, so that we can tailor our services, website and mailings to better suit you.
Administration of our records as they relate to members, Benefactors, Patrons and Supporters	It is a legitimate interest of ours that we keep these records in good order, so that we can continue to operate the charity.
Contact you about changes to our services	It is a legitimate interest of ours to ensure that you are aware if there are any changes to a product or service that may affect you. It is also a legitimate interest of yours to be aware of these.
Send you invitations to take part in research surveys, research discussion groups or interviews to give your opinions about products or services.	This is a legitimate interest of ours to ensure that the charity stays relevant and current to its supporters and members. Occasionally, a funder may request that we carry out certain research as part of our obligations towards them. Participation in these surveys is voluntary, but it is a legitimate interest of ours that we meet our funding obligations.

If you are attending an event of ours, we may use publicly available sources to identify you internally.	It is a legitimate interest of ours that we understand who attends our events so that we can tailor future communications/events.
We may use publicly available information about you to ensure that our database is accurate	It is a legitimate interest of ours to ensure that the information we hold is accurate and up to date.
If you are a potential donor, partner or other stakeholder, we may carry out due diligence using publicly available information. This will be to comply with any legal obligations that apply, as well as to comply with our internal policies.	Where the due diligence is a legal requirement, we rely on legal obligation for our use of data. Where the due diligence is carried out to comply with our internal policies, we rely on legitimate interests. It is a legitimate interests of ours to ensure that we are following our policies on ethics, acceptable of gifts etc when entering into agreements or arrangements with individuals to protect the reputation of the charity.

## PROFILING

In addition to the checks that we carry out for due diligence purposes, we may also occasionally access publicly available information about individuals to help inform our fundraising strategy. This takes the form of a light touch internet based search of an individual's name, to obtain basic details such as job/career and interests. This information enables us to establish relationships with individuals who are current supporters, or who are interested in becoming a supporter, and to tailor our communications accordingly.

The effect of this research will be that the communications that you receive from us as a result are more likely to be of interest to you.

If you have any questions or concerns about this, please contact [info@comptonverney.org.uk](mailto:info@comptonverney.org.uk).

## DISCLOSURE AND CONFIDENTIALITY OF YOUR INFORMATION

We will not share personal data with third party organisations for marketing purposes, but may outsource functions when we do not have the in-house capacity required, such as the use of a mailing house for mailings, IT support and analytical services related to the website. In such cases we will only use reputable and well vetted firms and have contracts and processes in place that ensure the safe and confidential processing of your personal data.

We will always ensure an adequacy decision or appropriate safeguards are in place before your personal information is transferred outside of the UK.

## RETENTION AND STORAGE YOUR PERSONAL DATA

Any personal data that you submit to us will be held on secure servers, based within the UK and EEA.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will retain your personal details for as long as you are an active customer or supporter. Your personal details will be deleted after 6 years since your last interaction with the organisation.

We have procedures to deal with any suspected data security breach. We will notify affected data subjects and the supervisory authority of a personal data breach in accordance with applicable laws.

## **ACCESS TO PERSONAL INFORMATION AND CORRECTION**

You have the right to:

- Object to the processing of your personal data in some cases. You have a right to object if we are using it for direct marketing purposes (e.g. to send you an email about a product or service we think you are interested in). You also have a right to object if the lawful basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest.
- Request a copy of the personal data we hold about you;
- Request correction of the personal data that we hold about you if it is incorrect or incomplete;
- Ask us to delete the information that we hold about you;
- Ask us to restrict how we use your personal data in certain circumstances;
- Ask us to send another organisation information that you have provided to us in a format that can be read by computer.

If you want to exercise any of your rights, please contact our Information Compliance Officer ([info@comptonverney.org.uk](mailto:info@comptonverney.org.uk)). Please note that these rights do not apply in all cases.

If you ask us to restrict our use of your personal data or delete it, we will not be able to provide you with our products or services.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

If you have any queries about this Privacy Policy, you wish to make a complaint, request further explanation of any issues relating to this privacy notice, or make a suggestion for improving our processes relating to the way we use personal data, please do not hesitate to contact the Information Compliance Officer.

## **CONTACT US**

Information Compliance Officer

Compton Verney

Warwickshire,

CV35 9HZ

01926 645500

[info@comptonverney.org.uk](mailto:info@comptonverney.org.uk)

We hope that we will be able to address any of your requests. However, you have the right to make a complaint about the processing of your personal data to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## CHANGES TO THIS PRIVACY NOTICE

We keep our privacy notice under regular review. You are advised to visit this page periodically in order to keep up to date with any changes. By continuing to use our services you will be deemed to have accepted such changes.

This privacy notice was last updated on 22 August 2022.

Please note that you can activate the setting on your Internet browser to refuse the setting of all or some cookies. However, if you use your Internet browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Site. Please also note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.