



## Creative History – Privacy Policy

(Reviewed and up dated May 2018)

Creative History values and respects your right to privacy and will always treat the information you choose to share with us with care and respect. This Privacy policy tells you how the information you share with us, or we obtain from other organisations is used and how we protect your privacy.

If you wish to check, up date or change any details; or have questions please contact [Creative History](#).

**By email:** [dataprotectionofficer@creativehistory.co.uk](mailto:dataprotectionofficer@creativehistory.co.uk)

**By phone:** 023 8073 2019 (Mondays 10:00 - 14:00)

**By post:** Creative History, 9 Spring Gardens, North Baddesley, Hampshire, SO52 9JG

### Who we are:

This policy covers Creative History

The Data Controller is Creative History

Creative History offers a range of educational related services. These include specialist school history and museum visits to work with children, professional development training for teachers, supply of educational resources and consultancy work.

Your acceptance of this policy, and Creative History's right to change it.

By using our websites, social media pages, or providing your information you consent to our collection and use of the information you provide in the way (s) set out in this policy. If you do not agree with this policy please do not use our sites, social media pages or services.



From time to time we make changes to this policy. Should we do so, we will post the changes on this page; and they will apply from the time they are posted.

## Legal Information:

The full legal entity is Creative History - Business Register Number: 2256635

## Your Data - the information we collect

This covers the information you have chosen to directly tell us yourself when you contact us to use one of our services; or in any other way, we may process the following types of information about you.

### Directly Given Information:

This covers the information you have chosen to directly tell us yourself when you contact us to use one of our services; or in any other way, we may process the following types of information about you.

- Name
- Contact details (such as address, phone numbers, email address)
- Your interactions with us. This may include days visited, themes taught, details about teaching groups, questions, referrals.
- Financial information in respect of service charges
- Venue you are in
- Preferences about personal interests and how you would like to be contacted.
- With regard to school visits for us to provide you with the service you request we may need to collect, process, store and share sensitive school data (such as group numbers, year group descriptions, specific needs of the learners where differentiation is needed). This will always be treated with care and respect in line with this policy and all of our staff and volunteers will be trained in their responsibilities under the General Data Protection Regulation. We will keep your data as long as our relationship continues and may keep anonymised data for a number of years so that if we rework with the same group in later years we can build on the previous learner experience.

### **Indirectly Given Information:**

This covers information that you don't share with us directly but that is shared with us by other organisations with your permission.

- The information that you have shared with us publicly on social media (e.g. Facebook or Twitter).
- Non-personal information such as IP addresses (the location of a computer on the internet), pages accessed, and files downloaded. This helps us to determine how many people use our sites, how many people visit on a regular basis, and how popular our pages are. This information doesn't tell us anything about who you are or where you live. It simply allows us to monitor and improve our service.

### **Information about obtained from third parties**

This covers information that has been shared with us about you by someone else. This includes:

- When an enquiry, or recommendation is made by a colleague or friend in your name.
- Data we receive from school and museum websites
- Personal information about you from service providers, the press, search engines, social media (e.g. LinkedIn) and reputable public data sources (e.g. School web pages) Personal information we may collect via these channels may include your job title, contact information, school location, class size, class interests and current level of knowledge. We may use this information to build a profile of you and your teaching to enable us to tailor a visit to learner's needs. This enables us to understand our clients better and helps us make appropriate suggestions to tailor our services to your needs to make the best use of your time and our resources. We may combine information we have obtained about you from these third party sources with other information that we hold about you for this purpose.

## How we use your data

We treat information about you with great care and respect, and your information is only used if we have legal grounds to do so, which might be because:

- you have provided consent
- it is necessary to allow us to deal with your request, enquiry or purchase; (contract)
- we have a regulatory or legal obligation to do so;
- or the information is being used with Legitimate Interest to further our educational aims.

## What is Legitimate Interest?

This legal ground for processing means that organisations can process your personal information if they

1. have a genuine and legitimate reason for doing so and
2. That use does not harm any of your rights and interests as an individual.

We may use the information we collect to:

- Fulfil your requests - put together a quote, school visit or suggestions for ways to support you
- Process sales transactions, verify financial transactions - such as linking your name and teaching group to a visit for the school to pay.
- Handle orders, deliver products and communicate with you about orders.
- Provide a personalised service to you when you visit our websites - this could include customising the content and/or layout of our pages for individual users
- Record any contact we have with you.
- Comply with legal and regulatory requirements and protect against fraud.

- Help diagnose problems with our website and server, administer our website, compile broad statistical data and update and maintain our website.
- Carry out research, profiling and screening on our supporters (using the data collection methods listed above) to help us gain a better understanding of them and to make appropriate suggestions for further work.
- Communicate with customers and supporters to share information about our work and how you can use it.
- We may on occasion use your email address to communicate with you directly and via social media sites, where you have provided us with that address. For example, future events are taking place where you previously expressed an interest,
- We may upload your email address to third party sites (e.g. Facebook and Google) to help us deliver targeted communications to you, and people similar to you, to help us improve the relevance and effectiveness of our fundraising and communications.
- If you enter your details onto one of our online forms, and you don't 'send' or 'submit' the form, we may contact you to see if we can help with any problems you may be experiencing with the form or our websites.
- Identify visitors to our sites or locations where we undertake operations.

### **Legitimate Interest to send you direct mail**

Unless you tell us not to, we will rely on our Legitimate Interest ground (explained above) for sending you direct mail. From time to time, we would like to post you exciting updates about our work, products and services. Unless you have requested that we do not send you some, or all of this, our direct mailings do include marketing.

### **Who we share your personal information with**

We have great respect for the information we know about you and we do not swap, sell or rent your personal information to anyone.

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an order of the Court.
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or websites.
- We are working with a secure partner that is carrying out work on our behalf.

These secure partners may include mailing houses, marketing agencies, IT specialists and research firms. The kind of work we may ask them to do includes: processing, packaging, mailing and delivering purchases, answering questions about products or services, sending postal mail, emails and text messages, carrying out research or analysis and processing payments.

### Where we store your personal information

Your information is stored on computers located in the UK or securely on the Microsoft cloud. We may transfer the information to other reputable third-party organisations as explained above - they may be situated inside or outside the European Economic Area. We may also store information in paper files.

### How long we keep your personal information

#### Clients

Without your support Creative History could not exist and because we value your time we believe it is important to keep track of a basic core of information that allows us to tailor visits and resources to suit you. Especially, if you or your organisation gets back in touch with us.

However, we know that things can change therefore if you do not interact with us for 6 years we will remove your details from our data base.

You have the right to request that we delete your details at any stage. Our contact details are at the top and bottom of this policy.



If you enter your details onto one of our online forms, and you don't 'send' or 'submit' the form, we may contact you to see if we can help with any problems you may be experiencing with the form or our websites.

We may also use your personal information to detect and reduce fraud and credit risk.

### Employees, Volunteers and Contractors

The Data protection Act states data should, 'not be kept longer than necessary for the purpose for which it was processed'. This has to be balanced against the legal obligation to keep business records, which include payments to employees, contractors and volunteer expenses for 6 years.

Therefore, Creative History will follow the policy of keeping personnel records for up to 6 years. At which point, unless otherwise requested by you or needed for a legal reason, your records will be securely destroyed.

The exception to this would be if a complaint has been made against you in relation working for Creative History. In this case your information would be kept for as long as is legally required. See complaints section in Appendix.

### Cookies and online policy

Currently, our website does not use cookies.

### Your rights and contacting us

The General Data Protection Regulation gives you certain rights over your data and how we use it. These include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure



- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

You have a right to ask us to stop processing your personal data, if it is not necessary for the purpose you provided it to us for (e.g. processing your request or registering you for a Creative History Event) we will stop. Please contact us on 02380732019 between 10am and 14:00 pm from Mondays or by emailing [data.protection.officer@creativehistory.co.uk](mailto:data.protection.officer@creativehistory.co.uk) if you have any concerns and we will be happy to help.

If you believe that any information we are holding on you is incorrect or incomplete, you wish to exercise any of your rights above, or you wish to change your contact preferences at any point you can do so by calling us 02380732019 between 10am and 3 pm from Mondays or by emailing [data.protection.officer@creativehistory.co.uk](mailto:data.protection.officer@creativehistory.co.uk)

You have a right to ask for a copy of the information we hold about you, if there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, please send a description of the information you want to see and proof of your identity (photo copy or scan of document with proof of who you are) by post to Patricia Silver-Warner, Data Protection Officer, Creative History, 9 Spring Gardens, North Baddesley, Hampshire, SO52 9JG. We may not accept these requests by email to ensure that we only provide personal data to the right person.

For more information about your rights under the General Data Protection Regulation, please visit the website of the Information Commissioner's Office at [ico.org.uk](http://ico.org.uk).