



# Privacy and Cookie Policy

## Privacy policy

This sets out the details of Winchcombe Museum's privacy policy in relation to information collected about you.

This policy applies to all employees, volunteers and trustees who process personal data.

## Who we Are

We are a registered charity called Winchcombe Town Trust, Charity Number 1173052

Any electronic communications will be made in accordance with the Privacy and Electronic Communications Regulations (PECR)

## What information do we collect about you?

We collect the personal data that you may volunteer as part of ticket bookings, online purchases, Membership or donation forms, e-newsletter sign-ups and visitor surveys.

Personal information we collect may include:

- [ your name and title
- [ postal address, email address and phone number;
- [ family and spouse/partner details, relationships to other donors and/or Members;

We will also collect and hold information about any contact you have with us as a visitor, customer, supporter, volunteer or staff member of Winchcombe Museum, and may consist of details of:

- [ online retail purchases;
- [ contact preferences;
- [ Gift Aid status;
- [ details of correspondence sent to you, or received from you;
- [ any other information provided by yourself at the request of Winchcombe Museum.

When we ask you to provide your personal information, we will let you know why we are asking, and how we will use your data, by directing you towards this notice.

## What we do with your information

Depending on your relationship with Winchcombe Museum, and the preferences you have indicated, data we hold may be used by us for the following purposes:

- [ Send you promotional, marketing or fundraising information by post, telephone or electronic means. These types of communications can include:
  - Informing you of other products, services or events related to Winchcombe Museum, such as exhibitions, events, or retail offers.
  - News and updates about Winchcombe Museum, such as via *What's On* guides, and marketing or supporter e-newsletters.
  - Other relevant communications based upon your relationship with Winchcombe Museum.
  - Data screening and cleansing, to check if we have accurate contact details for you.
  - To send you surveys, and for market research purposes.
- [ Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an e-newsletter from us is opened and/or how many links are clicked within the message. The data from this tracking is generally used in an aggregated and anonymised form.

You can opt out of any / all of our communications at any point simply by contacting:

Data Protection Officer  
Winchcombe Museum  
High Street  
Winchcombe  
Glos GL54 5LJ

Or by email: [winchcombe2017@gmail.com](mailto:winchcombe2017@gmail.com)

There are some Membership and donation communications that we are required to send regardless of your contact preferences. These are essential communications, deemed necessary to fulfil our contractual obligations to you. This would include advanced notices, thank you letters, Member benefits, Membership cards, renewal reminders, Gift Aid confirmation letters and querying any returned mail.

## Who we might share your information with

We do not disclose personal data to any third parties or external organisations, other than data processors carrying out work on our behalf.

Examples of such data processors would be mailing houses for the sending of bulk email distribution services, or wealth screening and data cleaning organisations.

Any such companies are acting as approved data processors for Winchcombe Museum, and we retain full responsibility for your personal data. Data processors will act only on our instructions.

We are required to ensure any transfers of data will be done securely, in accordance with best practice, and in compliance with the Data Protection Act 1998.

Your data will never be sold or passed to any third party for any other purpose.

## How we keep your information secure

We have implemented security procedures, rules and technical measures to protect the personal data that we have under our control from:

- [ unauthorised access;
- [ improper use or disclosure;
- [ unauthorised modification.

All our employees and data processors, who have access to, and are associated with the processing of personal data, are legally obliged to respect the confidentiality of our visitors' and supporters' personal data.

## Data Security Summary

In respecting personal data for which it is responsible, the Trust expects staff, volunteers and trustees to ensure that:

- [ Computers and laptops containing personal data are kept password protected at all times and locked when not in use, with screen locks enabled if left unattended. Passwords should not be shared or left visible.
- [ Data and equipment (e.g. laptops) are never left vulnerable, particularly in public places;
- [ All staff, volunteer and member details are kept locked.
- [ Files containing personal data are kept locked away when not in use.
- [ All of the museum's computers are password protected.

## Data and Document Retention

<b>File Type</b>	<b>Paper files – Retention period (in years)</b>	<b>Electronic Records – Retention period (in years)</b>
<b><i>Accounting and Finance</i></b>		
<b>Purchase invoices, petty cash records, staff expenses etc</b>	6 from year's end.	6 from year's end.

<b>File Type</b>	<b>Paper files – Retention period (in years)</b>	<b>Electronic Records – Retention period (in years)</b>
<b>Capital expenditure invoices</b>	10 from year's end	10 from year's end
<b>Supplier correspondence, quotes, tender documentation</b>	6, from year's end	6, from year's end
<b>Bank paying in counterfoils and bank statements</b>	6 from year's end.	6, from year's end
<b>Bank reconciliations</b>	6 from year's end.	6, from year's end
<b>Donor correspondence and remittance advices</b>	6 from year's end.	6, from year's end
<b>Gift Aid declaration Forms</b>	6 from year's end.	n/a
<b>Legacies</b>	6 after the estate has been wound up	6, from year's end
<b>Payroll records</b>	6 from year's end.	6, from year's end
<b>Annual returns to HMRC etc</b>	6 from year's end.	6, from year's end
<b>Investments certificates</b>	retained indefinitely	retained indefinitely
<b>Insurance</b>		
<b>Policies</b>	3, after lapse	3, after lapse
<b>Claims correspondence and accident reports</b>	3 after settlement	3 after settlement
<b>Employer's Liability insurance certificate</b>	6, from year's end	6, from year's end
<b>Contracts</b>		
<b>Contracts with public and private sector funders, suppliers and all other agreements or contracts</b>	6 from expiry or termination of contract	6 from expiry or termination of contract
<b>Property</b>		
<b>Maintenance and repair contracts</b>	10, after performance	10, after performance
<b>Service agreements</b>	10, after service ends	10, after service ends
<b>Museum Member data</b>		
<b>Application form, membership and contact details</b>	Application form shredded as soon as data inputted on electronic database. Kept locked within the office until this point.	Contact details and membership details up to 6 months past the annual renewal date.
<b>E-newsletter recipients</b>		
<b>Contact details for recipients of all e-newsletters (museum, museum members, family activities, Tourist Information)</b>	Any paper records to be shredded as soon as data inputted.  Consent forms retained until the recipient opts out of receiving newsletters (and requests to opt out are	Data deleted as soon as recipient requests this.

<b>File Type</b>	<b>Paper files – Retention period (in years)</b>	<b>Electronic Records – Retention period (in years)</b>
	recorded).	
<b><i>Donor's to the museum's collection</i></b>		
<b>Entry and Exit forms and associated information inputted onto Accession Book and database</b>	Entry and Exit forms are retained indefinitely. Accession Book retained indefinitely	Full catalogue details retained indefinitely
<b><i>Volunteer data</i></b>		
<b>All hard copies of volunteer data e.g. application forms contained within volunteer files</b>	1 year after a volunteer has stopped volunteering.	N/a
<b>Contact list used by staff managing volunteers</b>	List kept current, and volunteer details deleted immediately upon a volunteer leaving the museum.	List kept current, and volunteer details deleted immediately upon a volunteer leaving the museum.
<b><i>Employee records</i></b>		
<b>Contracts of employment</b>	up to 10 years	up to 10 years
<b>References</b>	up to 5 years	up to 5 years
<b>Annual performance records</b>	up to 5 years	up to 5 years
<b>Current contact details (including address)</b>	up to 5 years	up to 5 years
<b>Financial records</b>	up to 6 years from year's end.	up to 6 years from year's end.

## **How can I access the information about me, and correction of information?**

You can ask us if we are keeping any personal data about you and you can also request to receive a copy of that personal data – this is called a Subject Access Request.

To make a Subject Access Request you will need to provide adequate proof of identity such as a copy of your passport, birth certificate or driving licence before your request can be processed. There may also be a fee of up to £10 depending on the volume of work required.

Please try to be as clear as possible about the information you are seeking.

Once we have received your Subject Access Request, the agreed fee and proof of identity, you will receive a response from us within 30 days and you will be able to get copies of any information we hold on you. This includes whether any personal data is being processed; a description of the data; the reasons it is being processed, whether it will be shared and the source of the data. However, exemptions to disclosure may apply in some circumstances.

Subject Access Requests should be sent to:

Data Protection Officer  
Winchcombe Museum  
High Street  
Winchcombe  
Glos GL54 5LJ

Or by email: [winchcombe2017@gmail.com](mailto:winchcombe2017@gmail.com)

At any time, you may request that we delete or correct your personal information. If you wish to correct any information on you held by Winchcombe Museum, simply contact the Data Protection Officer at the address above.

For further information on data access see the Information Commissioner's Office web site:

<https://ico.org.uk/your-data-matters/>

## Website

### Web Log Files

In line with common practise we automatically log certain information about every visit to this website. This includes information provided automatically by your web browser program and will consist of items such as your internet IP address, time and date of access, web pages and images viewed. This information does not allow us to identify you personally and is used only to monitor levels and patterns of use of our website.

### Cookies and How We Use Them

Cookies are small text files sent over the internet and which are stored on your computer by your web browser. These files are then sent back to our servers each time you visit our website and allow us to provide continuity as you move from page to page or return to our website in the future.

We also use the Google Analytics service to analyse ways in which our website is used. Google Analytics may also use cookies within our website to provide information about patterns of use. Google will store any information gathered by this service and this information will be subject to Google's privacy policy, available at: <http://www.google.com/privacypolicy.html>.

### What If You Are Not Happy About Us Using Cookies?

If you are not happy about our use of cookies you should adjust the settings in your web browser to reject new cookies and delete any already on your computer. You should be aware that if you do reject or delete cookies, you may see changes in the behaviour of the website and certain functions will not be available to you.

If you wish to go ahead and reject cookies from our website, the following resources will tell you more about cookies and how to set up your web browser to suit your preferences:

[ *All About Cookies*– [www.allaboutcookies.org](http://www.allaboutcookies.org),

- [ *BBC "Privacy & Cookies"*– <http://www.bbc.co.uk/privacy/cookies/about/types-of-cookies.html>
- [ *Your Online Choices (UK)*– <http://www.youronlinechoices.com/uk/>

## **Changes to our privacy notice**

We regularly review our privacy notice and may make changes time to time. Any changes made will be posted to this page and will apply from the time we post them. This privacy notice agreed on 29<sup>th</sup> April 2019.

## **How to contact us**

If you have any comments on our privacy notice, or information we hold about you please contact us:

Data Protection Officer  
Winchcombe Museum  
High Street  
Winchcombe  
Glos GL54 5LJ

Or by email: [winchcombe2017@gmail.com](mailto:winchcombe2017@gmail.com)