

## **Ampleforth Abbey Trust Visitor and Guest Privacy Notice**

### **What is the purpose of this document?**

Ampleforth Abbey Trust ("the Trust") is committed to protecting the privacy and security of personal information pertaining to visitors and guests.

This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (**GDPR**) and relevant regulations (including the Privacy and Electronic Communications Regulations (**PECR**)) during and after your relationship with us the purpose of which is to provide hospitality, lettings and commercial opportunities as well as the use of our public facilities.

The Trust is a "data controller". This means that we are responsible for deciding how we hold and use your personal information. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to all visitors and guests of Ampleforth Abbey Trust but does not form part of any contract with you. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about visitors and guests, so that you are aware of how and why we are using such information.

### **Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **The kind of information we hold about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of data about you:

- Personal information, for example: name and date of birth.
- Contact details, for example: email addresses, telephone numbers, postal addresses and emergency contact numbers.
- CCTV footage captured on site.
- Photographs and video footage, for example: photos taken during events hosted by the organisation.
- Emergency contact details, for example: other members of the family/next of kin
- Identity documents such as driving licences.
- Bank account details

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- Medical information, for example: illness, physical disability, allergies and prescribed medication.
- Information about criminal convictions and offences, including potential blacklist notifications.

### **How is your personal information collected?**

We collect personal information about you from that which is provided to us when you make enquiries, request bookings, set up memberships, sign in upon arrival, make purchases and pay outstanding invoices. In certain circumstances, third-parties may supply information regarding prohibited access and individuals on blacklists. This information would be provided by the North Yorkshire Police.

### **How we will use information about you**

We will only use personal information relating to you when the law allows us to. Most commonly,

we will use such personal information in the following circumstances:

1. Where we need to perform a contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where you have given a freely given, specific, informed and unambiguous consent to the processing of your personal information for one or more specific purposes.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

### **Situations in which we will use your personal information**

With reference to the grounds set out in the list above, we have indicated in the boxes below the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

#### **Where we need to perform a contract we have entered into with you**

1. Administering a contract with an individual wishing to rent a property. This will include, where necessary and depending on the circumstances, storing your personal data and that of associates on our data base.
2. Processing information in relation to the payment of the use rental properties. This will include, where necessary, storing financial information about you.

#### **Where we need to comply with a legal obligation**

1. Checking you are legally entitled to reside in the UK. This will include processing personal data such as your passport, birth certificate and other identification documents.
2. Complying with safeguarding obligations for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as courts, the local authority or the police where legally obliged to do so.
3. To prevent money laundering, this will include, where necessary and depending on the circumstances, storing your National Insurance number, passport, driving licence, or other ID, such as a birth certificate.

#### **Where you have given a freely given, specific, informed and unambiguous consent to the processing of your personal information for one or more specific purposes**

1. Taking and displaying photographs and video footage of you which may be published on the

Trust website or other social media which promote the Trust.

2. Where you have given consent to be contacted in a marketing or promotional capacity.

**Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.**

1. Undertaking credit reference checks with a licensed credit reference agency to verify your identity to protect the Ampleforth Abbey & College in terms of money laundering activities
2. Processing data on CCTV to ensure the site is safe, this will include the storage of images on CCTV footage.
3. Processing individual/group invoices, bookings, Abbey Shop and Tea Room purchases and membership to St. Alban's Centre and the facilities it provides.
4. Subscription to e-newsletters, Echoes of The Word and singing up to promotional offers.
5. Maintaining and updating membership to Ampleforth Trust societies which you have chosen to join.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

**If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract entered into with you, nor provide our range of services and facilities. Similarly, we may be prevented from complying with our legal obligations such as to ensure the health and safety of students and other guests and visitors on site.

**Change of purpose**

We will only use your personal for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

### Our obligations

The Trust may hold special category data relating you in certain circumstances. If we do we may use it in the following ways:

- In limited circumstances with your consent.
- Where the processing is necessary for reasons of substantial public interest.
- To protect the vital interests of any person where that person cannot give consent.
- In the exercise or defence of a legal claim.

### Do we need your consent?

We may approach you for your written consent to allow us to process certain particularly sensitive personal data about you. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that, in accordance with our written policy document, there are circumstances permitted by law where we may use particularly sensitive personal data without your consent.

### Automated decision-making

We do not envisage that any decisions will be taken about you, by using automated means, however we will notify you in writing if this position changes.

### Data sharing

We may have to share your personal information with third parties, including third-party service providers and other entities in the Ampleforth Abbey group, which comprises of Ampleforth Abbey Trustees, St Laurence Education Trust, Ampleforth Abbey Trading Limited and St Benet's College (the "Ampleforth Abbey Group").

We require third parties to respect the security of your data and to treat it in accordance with the law.

### Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer a contract with you or where we have another legitimate interest in doing so.

### Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within Ampleforth Abbey Group.

In line with our legal obligations we may share your personal data with local authorities such as the North Yorkshire Police.

### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the Ampleforth Abbey Group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group as part of the provision of services to you and to promote the objects and interests of the organisation.

### **Transferring information outside the EU**

We will not normally transfer your personal information outside the EU. In circumstances where we do this we will only transfer the data to a country where you can expect a similar degree of protection in respect of personal information.

### **Data security**

We have put in place measures to protect the security of your personal information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and

whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Director of Governance in writing at [governance@ampleforth.org.uk](mailto:governance@ampleforth.org.uk)

**No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Manager at [data.manager@ampleforth.org.uk](mailto:data.manager@ampleforth.org.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Data privacy manager**

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at [procurator@ampleforth.org.uk](mailto:procurator@ampleforth.org.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact our Data Protection Officer [procurator@ampleforth.org.uk](mailto:procurator@ampleforth.org.uk)**