

ROYAL HIGH SCHOOL PRESERVATION TRUST

Scottish Charity Number SC045799

PRIVACY POLICY

January 2024

1. Introduction

- 1.1. Royal High School Preservation Trust (“RHSPT”) respects the privacy of visitors to its website and any other individuals from which RHSPT collects personal data.
- 1.2. This Privacy Policy explains how RHSPT collects, safeguards and uses personal information to be included on <https://www.rhspt.org/> and all subsequent webpages, emails and other communications under the control of RHSPT.
- 1.3. It is important that this privacy notice is read in conjunction with RHSPT’s Data Protection Policy, which contains more detailed information about its data processing.

2. Important information and who RHSPT is

- 2.1. RHSPT is the controller and responsible for this website and any personal data thereon.

Its full details are:

Full name of legal entity: Royal High School Preservation Trust

Registered address: 51 Atholl Road, Pitlochry PH16 5BU

- 2.2. If there are any questions about this privacy policy, including any requests to exercise your legal rights, please contact info@rhspt.org
- 2.3. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. The data we collect about you

- 3.1. Most data we collect are used only to help us better serve our visitors, supporters and stakeholders. 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). We may collect, use, store and transfer different kinds of personal data about you as follows:
 - (a) Identity Data. This includes your name, country, username or similar identifier, title.
 - (b) Contact Data. This includes email address and telephone numbers.
 - (c) Technical Data. This includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
 - (d) Profile Data. This includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - (e) Usage Data. This includes information about how you use our website, products and services. Through our websites and apps, we receive and store certain details through “cookies” which record how the sites are being used to help us provide improved services, analyse usage and enable transactions. Cookies are small text documents that are stored by your web browser on your computer or mobile

device when you visit our website. They enable an enhanced experience for you by storing things such as your user details or preferences. The benefit for us is that they track your use of our site, so we can analyse trends and improve our service. They don't tell us who you are. Our website can only see cookies that it has created, not those issued from any other website. You can decide whether or not to allow cookies on your computer.

- (f) Marketing and Communications Data. This includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (g) Donation history. This includes any donations you have made to RHSPT.
- (h) Information you provide to us by email, letter, telephone, social media, via our website or in person
- (i) CCTV security recordings

3.2. We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3.3. We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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

3.5. Where we need to collect personal data by law, or under the terms of a contract or arrangement 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, or our obligations under another arrangement. In this case, we may have to cancel the contract or arrangement you have with us but we will notify you if this is the case at the time.

4. How we collect your data

We use different methods to collect data about you, including:

4.1. Direct interactions. You may give us, for example, your identity, contact details and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

4.2. subscribe to our service or publications;

- (a) request marketing or other communications to be sent to you;
- (b) enter a competition, promotion, study or survey; or
- (c) give us feedback or contact us.

4.3. Automated technologies or interactions. As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal

data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

- 4.4. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources, such as technical data from analytics providers (such as Google) and search information providers, contact, financial and transaction data from providers of technical, payment and delivery services or identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

5. How we use your personal data

5.1. We will only use your personal data when the law allows us to.

5.2. Developing a good understanding of visitors, participants and supporters through personal data allows us to make better business decisions enabling us to operate, market our services, and fundraise more efficiently. We believe this will help us reach our goals and deliver public benefit. Most commonly, we will use your personal data in the following circumstances:

- to fulfil our contract with you
- to keep a record of the relationship we have with you
- to process a transaction and carry out completion of a purchase or donation (your personal information and card details may be passed to third party service providers; card details will only be used in this way for the purpose of handling an individual transaction)
- to inform you about relevant events, services or activities we believe will be of interest, as well as opportunities to support our work as an arts charity
- to provide a personalised service and ensure the best possible experience when you visit us
- to administer any donations you may make, including processing Gift Aid
- to ensure that the information we already hold is accurate and up to date
- to improve our products, services and information in the future
- as a charity we'd like to send you occasional updates on our charitable work and we may invite you to support some of our projects
- we may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you.
- wealth screening and research to help us understand our potential donors including gathering information from publicly available resources to give an insight into your philanthropic interest and ability to support RHSPT
- to send you surveys and for market research purposes
- to assist us with reporting and analysis for our own needs or the needs of any funding partners
- to ensure we know how you prefer to be contacted
- to protect against fraud or unlawful activity
- to ensure compliance with policies, procedures and laws
- to process any recruitment information, whether directly or via an agent

5.3. The types of lawful basis that we will rely on to process your personal data are:

- (a) Legitimate Interest. This means the interest of our organisation in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive

and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

(b) Performance of Contract. This means processing your data where it is necessary for the performance of a contract or arrangement to which you are a party or to take steps at your request before entering into such a contract.

(c) Comply with a legal obligation. This means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

5.4. Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

5.5. The purposes for which we use your personal data

(a) We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

(b) Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members/customers use our products/services)
To enable you to partake in a competition or study or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how members/customers use our products/services, to develop them and grow our business)
To administer and protect our organisation and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our website/products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To ensure donation requests and communications are relevant and timely we may build a profile about you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interest as profiling allows us to target our resources effectively, to understand the background of the people who could support us. This helps us to make appropriate requests to supporters who may be able and willing to give more than they already do. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would. You can opt-out of your data being utilised for wealth screening, data cleansing or analysis (with the aims of targeting communications with you appropriately or finding up-to-date contact information in the case of gone away mail) simply by contacting info@rhspt.org

(c) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Marketing and promotional communications

- 6.1. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.
- 6.2. We may use your identity, contact information, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.
- 6.3. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
- 6.4. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.
- 6.5. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of other interactions with us for other legitimate purposes.

How we share your personal data

- 7.1. We do not sell your details or mailing lists to third parties.
- 7.2. In the event that RHSPT should merge with, or be acquired by, another entity, RHSPT may merge your data then stored by RHSPT with the data of the other entity, in compliance with the law in effect at the time.
- 7.3. We may share your personal data with external parties where it is necessary for us to do so in order to process the data for the purposes set out in the table above.
- 7.4. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

- 8.1. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that acceptable safeguards are in place, such as only transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data, or using specific contracts with third parties approved for use in the UK which give personal data the same protection it has in the UK.

8.2. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Your legal rights

9.1. Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to:

- (a) Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - i. If you want us to establish the data's accuracy.
 - ii. Where our use of the data is unlawful but you do not want us to erase it.
 - iii. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - iv. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you

withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- 9.2. If you wish to exercise any of your rights, please contact us. You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 9.3. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 9.4. You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data protection issues (www.ico.org.uk).

Data retention

- 1.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 1.2. 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, regulatory, tax, accounting or other requirements.
- 1.3. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

2. Keeping your details safe

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

For your protection, we recommend that you do not provide your login or password to anyone. If you become aware of any suspicious activity relating to your information, please contact us immediately on email address info@rhspt.org.

3. Cookies

- 3.1. Our website may use cookies to enhance your online experience. Use of cookies makes web surfing easier by performing certain functions, such as saving your personal preferences and completing your basic site login to access content. Cookies do not allow access to your member account. These steps require an additional login.
- 3.2. In addition, small anonymous cookies are installed in your web browser. These are in place to allow our database modules to operate correctly.
- 3.3. If you would prefer not to receive cookies, you can alter the configuration of your browser to refuse cookies. If you choose to refuse cookies, it is possible that some areas of our website will not function fully or may be slower than you are used to.
- 3.4. We do not share cookies with any third parties and do not use them to participate in any external linking or tracking.

4. External websites

- 4.1. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We have no control over and are not responsible for the privacy policies of any websites other than our own.

5. Security

- 5.1. Unfortunately, the transmission of information via the internet is not completely secure. We will, however, take reasonable and appropriate technical measures to prevent unauthorised access to or disclosure of your information.
- 5.2. Your transmission of any information on or through our Site is, however, completely at your own risk. As such, we shall have no liability for disclosure of any of your information which arises due to an error in transmission or the fraudulent or negligent or other illegal acts of a third party, for

example hacking.

6. Future changes to this policy

6.1. From time to time our policies will be updated to reflect changes to the law, new business practices and changes in the communications environment.

7. Further details

7.1. If you have any questions about our Privacy Policy, the practices of our websites, or your dealings with these websites, send an email to info@rhspt.org

7.2. Further information on how we process your personal data including on data security, data retention and lawful processing bases, please refer to our Data Protection Policy, which is available on request.

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