

# **Royal Pavilion & Museums Foundation – Personal Data Protection Policy**

**As of 1 July 2017**

## **Conserving your personal data**

Thank you very much for taking the time to read our Personal Data Protection Policy. We know that your personal data is precious to you. That is why we want to ensure that we treat the personal data we hold with the same care and respect with which we treat our buildings and collections.

The Royal Pavilion & Museums Foundation is responsible for raising money to protect and conserve the five buildings and the 1 million+ items and artefacts that make up the Royal Pavilion & Museums collection. Funding is raised in a number of ways, including donations, legacies, grants, corporate partnerships and our Members' and Patrons' schemes. In order to successfully raise the funding needed, it is necessary for us to collect, store and process personal data.

Personal Data is collected in accordance with the Data Protection Act 1998. Our Personal Data Protection Policy details how the Royal Pavilion & Museums Foundation collects, stores and uses your data and why this is important to us. We also explain how you can change your preferences.

We want you to feel in control of how your data is used. You are free to opt-out of any of the data uses at any time. We have tried to keep the information in this policy as clear as possible. However, should you ever have any questions about how your data is being used, or if you would like us to change the way we use your data, please do not hesitate to contact David Burgess (Head of Fundraising, Royal Pavilion & Museums Foundation):

- Royal Pavilion & Museums Foundation, 4/5 Pavilion Buildings, Brighton, BN1 1EE
- [david.burgess@brighton-hove.gov.uk](mailto:david.burgess@brighton-hove.gov.uk)
- 01273 296 471

For more information on Data Protection and your rights, visit the website of the Information Commissioner's Office – [www.ico.org.uk](http://www.ico.org.uk). In particular, you might find this guidance document useful - <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

## **Royal Pavilion & Museums Foundation**

This Personal Data Protection Policy is for Royal Pavilion & Museums Foundation. Registered Address: 4/5 Pavilion Buildings, Brighton, BN1 1EE

The Royal Pavilion & Museums Foundation (the Foundation) is a registered charity (275242). It exists to raise funds for the Royal Pavilion & Museums, helping to conserve its historic buildings and artefacts, share its collections and bring the very best of art and culture to Brighton & Hove.

The Foundation is an independent charity - separate from Royal Pavilion & Museums and Brighton & Hove City Council. While this policy solely covers the Foundation's use of data, we work closely with these organisations, as explained below.

## **Why does the Foundation need your personal data?**

The personal data we collect, store and process enables us to:

- 1 Receive and process your donations and membership subscriptions** - We want to make it as easy as possible for you to support the Royal Pavilion & Museums, providing you with a range of payment methods that are appropriate for you. Many of these payment methods require us to collect additional data in order to process your gift.
- 2 Provide you with exciting membership benefits** - We want to be able to thank you for your support and show you the impact your gift has on the Royal Pavilion & Museums. The data we hold enables us to provide you with a range of benefits, including free entry to the museums, discounts in the shops and cafes, exclusive events and a regular newsletter.
- 3 Make your gift go further by claiming GiftAid** - GiftAid enables your donations to go even further, with HMRC providing an additional 25p for every £1 you donate. In order to claim this, HMRC require some personal data to ensure you have paid enough tax to cover the GiftAid.
- 4 Ensure our fundraising messages and communications are appropriate and relevant to you** - With 5 buildings housing over 1 million items, our exhibitions, collections and events cover a wide range of topics. Understanding what interests you enables us to share appropriate stories, events, fundraising appeals and other updates to ensure you never miss out on hearing about the things you care passionately about.

## **What does the Foundation do with your data?**

Below, we have described the different ways we use your data. We have tried to provide all of the information you need so you are fully informed as to how your personal data is used. If you would like more information about any of the uses, to change your preferences or to opt-out of any of the uses, please do not hesitate to contact us.

### **1 Receiving and Processing your donations and membership subscriptions**

Information about any donations you make to the Foundation (including membership subscriptions) is saved on our database system, ThankQ. This includes the gift amount, the date the gift was made, the payment method, whether the gift is eligible for GiftAid and any restrictions or conditions on the gift. This enables us to maintain an accurate record of all donations. This is important as it enables us to thank you for your donations and helps us to ensure we show you the impact of your gift. It also enables us to fulfil our reporting requirements with the Charity Commission, Arts Council England and other funders.

In addition to keeping electronic records, we also retain original copies of your membership or donation form. This information is securely stored. We keep this in order to provide evidence of your gift, your GiftAid declaration (if given) and to respond to any queries regarding your membership or contact information as they arise.

We also use information about the types of appeals you have previously supported to let you know about future campaigns that we believe will be of interest to you. For example, if you have previously supported an appeal for the restoration of an item, we will write to you about similar appeals in future. This is to ensure that you never miss out on the opportunity to do something amazing. (See Section 4 below for more information).

Certain payment methods require the use of personal data in order to process donations and gifts:

- **Direct Debit** – Many of our members chose to pay their membership subscription by Direct Debit, as it is an easy and efficient way of making regular gifts or renewing your support. The Foundation's Direct Debits are processed by Rapidata – a third party organisation. In order to do this, Rapidata are provided with each members' name, address, telephone number, sort code, account number, account name and donation amount. This information is shared with Rapidata via a secure portal. We are also required to store hard copies of this information in order to respond to any queries.
- **Credit or Debit Card** – Donations and membership subscriptions paid by Credit or Debit Card are processed by the Foundation, using a secure portal. Card details aren't stored electronically. Card details on paper forms are destroyed after the payment has been processed.
- **Online Donations** - The Foundation partners with JustGiving and the Charities Aid Foundation to receive donations online, through Text Giving and via Contactless payment systems. These partners collect your data to process your donation on our behalf. We will notify you on each donation form when we are using a third party. You can read the privacy policy for JustGiving (<https://www.justgiving.com/info/privacy>) and Charities Aid Foundation (<https://www.cafonline.org/navigation/footer/privacy>).
- **Renewals and Reminders** – your membership subscription lasts for one year. In the last two months of your membership we will send you a reminder and the opportunity to renew your membership. We do this to make it as easy as possible for you to continue your membership and ensure that you do not miss out on any of the membership benefits.

Renewal and Reminder letters are printed and sent by Synergy - a third party organisation. We provide them with members' names, addresses, telephone numbers, email addresses and current membership subscription level. This information is used to pre-fill sections of the renewal form. We do this to save you time in completing the form, to show you the information we hold for you and to make it as easy as possible for you to update the information we hold or to change your contact preferences.

- **Contact Details** – mailing information has a cost and we want to ensure we do not waste valuable funds on mailing those who do not wish to hear from us. From time to time we might work with a third party company to review and "clean" our data. This uses publicly available information to identify out-of-date or incorrect records and to update contact details.

## 2 Providing you with exciting membership benefits

To thank you for your support we offer a number of benefits, depending on the level of membership to which you subscribe. In order to provide these benefits we use your data in the following ways:

- **Newsletters, Mailings and Event Invitations** – we know that our members enjoy hearing about the work going on at the Royal Pavilion & Museums, and seeing how their support has made a difference. As a member you will receive three newsletters a year with stories from across the five RPM sites. Please note that our newsletter often includes information about other fundraising activities, such as fundraising appeals and information on other ways you can support.

You will also receive information about exclusive members' events and a "What's On" guide (produced by Royal Pavilion & Museums) outlining events across the five sites for which members receive a discount.

- Please note that other events – for example, the events listed in the "What's On" guide – are managed by the Royal Pavilion & Museums, and not the Foundation. The discount for members is offered at their discretion. The data provided when booking for these events is subject to the Royal Pavilion & Museum's own Data Protection Policy, which can be found here - <http://brightonmuseums.org.uk/about-us/policies/privacy-data-protection/>

With over 2,600 members we are not able to manage mailings internally. We work with Synergy – a third party company - to process large mailings. This requires us to share members' names and addresses with Synergy for the sole purpose of sending out Royal Pavilion & Museum Foundation mailings. (See below for more information about our work with third parties).

- **Discounts and offers** – our members are eligible for discounts on Royal Pavilion & Museums' events, in the on-site shops and cafes. These discounts are provided by our partners and not by the Foundation. We do not share personal data in order to provide these benefits. Any data provided by our members in booking for Royal Pavilion & Museums events or during transactions in the shops and/or cafes are held by Royal Pavilion & Museums and subject to a separate Data Protection Policy. Royal Pavilion & Museums Data Protection Policy can be found here - <http://brightonmuseums.org.uk/about-us/policies/privacy-data-protection/>
- **Young Members and Concessions** – we offer a number of concessions for members based on age. We ask for your date of birth and store this information on our database. We will check this information when you renew to ensure that you are eligible for these discounted rates.
- **Email and Phone** – If you have consented to us contacting you by email and/or telephone we will use these to communicate with you about your membership. This includes contacting you regarding queries about your membership and informing you of special events and invitations. We may save the contents of emails on ThankQ (our database system) to maintain a record of communication.

- **Third Party Offers** – The Foundation will not sell or make available your data to other organisations beyond the Royal Pavilion & Museums for the purpose of marketing. However, we may occasionally contact you on behalf of other organisations to extend invitations or discounts to our supporters. We will only do this where we believe the invitation or discount will be of genuine interest to our supporters. This might include (but is not limited to) priority booking or discounted tickets for third party arts and culture activities, invitations to events about the Royal Pavilion or other aspects of local history run by third parties, or information about events happening at one of the Royal Pavilion & Museums’ venues.

### **3 Claiming GiftAid to make your support go even further**

If you are a UK tax payer and have consented to us claiming GiftAid we are able to benefit from an additional 25p from HMRC for every £1 you donate. In order to do this we save a record of your GiftAid declaration. This includes your name, address and the date the declaration was given.

In order to claim GiftAid, we must send HMRC a list of eligible donations. This list includes your name, address, donation amount and donation date. HMRC uses this data to ensure that you have paid enough tax in each financial year to cover the amount of GiftAid to be claimed. ***Please note*** – *if you pay less Income Tax and/or Capital Gains Tax than the amount of GiftAid to be claimed on all of your charitable donations in that tax year, it is your responsibility to pay any difference.*

This information is shared with HMRC via a secure portal. We are also required to keep a copy for the purpose of dealing with any enquiries.

### **4 Ensure our fundraising messages and communications are appropriate and relevant to you**

As a supporter we know you care passionately about the work of the Royal Pavilion & Museums. The Membership scheme is just one of the ways that the Foundation raises money to support the work of the Royal Pavilion & Museums. We also rely on events, specific appeals and campaigns, gifts in wills, corporate support and grants from Trusts to support our wide-ranging programme of work.

Our supporters regularly tell us that they would like to be able to help wherever they can. However, we know that you have other demands on your time, money and passion. As a result, our supporters also tell us how important it is to receive fundraising appeals that are appropriate for them. In order to do this, we use data to understand your interests and preferences to ensure that our fundraising messages are appropriate and relevant for you.

This includes:

- **Researching and Recording your interests** – Our supporters often tell us about their interests and the things they care most passionately about. This could be via email, over the phone, in surveys, in a letter or during face-to-face meetings or conversations. In addition, we may occasionally carry out desk research, using publicly available information, to find out more about our members and supporters. This could include information about your interests, previous donations and connections to other organisations.

This information on our database and enables us to tailor our communications to your specific interests. This includes telling you about events, updates, fundraising appeals or future plans relating to the things we believe you will be most interested in. This ensures you never miss out on opportunities relating to the aspects of our work you are most passionate about.

- **Understanding your donation preferences** – We know that our supporters often have preferences about how and when they make their gifts. For example, this could include times of year, types of campaigns or payment method. We use this data to tailor our approaches and fundraising messages to ensure they reflect your preferences.
- **Wealth and Prospect screening** – To provide you with the most appropriate opportunities to support the Royal Pavilion & Museums, it is not just your interests we need to understand. Research shows that supporters appreciate being asked to support at the financial level most suited to their ability to give and that they prefer charities to have done their research in advance. Occasionally, the Foundation may use the data we hold to commission research in to the financial position of our supporters. This uses publicly available information to help us offer you the most appropriate opportunities to support our work based on your financial position. This research might include Wealth Screening (identifying supporters capable of giving larger gifts), Prospect Research (identifying supporters most likely to support an appeal or campaign based on their previous donations to other causes) or Mosaic Analysis (understanding a supporter's financial position and key lifestyle factors).
- **Due Diligence** – we may also publicly available information to carry out Due Diligence checks on supporters, to meet money laundering regulations.
- **Personal connections** – our supporters are some of our best ambassadors for the work of the Royal Pavilion & Museums and the Foundation. When we are considering an approach to potential supporters (including individuals, companies and trusts) we use your data to try and identify connections to our existing supporters. This could include researching business links, membership of clubs or societies, education history or associations with other organisations.

## **The Foundation and Third Parties**

The Foundation does not sell your data, or make it available to other organisations or third parties for commercial purposes. However, there are times when we need to share your data with third parties in order to carry out the actions described above. Under the Data Protection Act 1998, these

organisations are 'Data Processors'. We expect these third parties to treat your personal data with the same respect that we do.

In choosing Data Processors to partner with, we ensure that they will keep your personal data safe and secure, and will only use it for the purposes requested by the Foundation.

### **Future Changes**

Occasionally we may need to change the way we use your data in response to changing needs, processes, legal requirements or activity. We will update this policy to reflect any changes. We will endeavour to highlight where changes have been made.