



Privacy Policy

Last updated on [14 July 2021]

Introduction

This privacy policy applies between you, the user of this website, (**you** or **your**) and Bethlem Gallery Projects Limited, a company limited by guarantee registered with company registration number 08194872 (**we** or **our**).

We are the data controller in respect of any personal data that you provide to us. As such we have certain responsibilities to you in respect of your data.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights.

Important information

- 1 This privacy policy aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you subscribe to our newsletter.
- 2 This website is not intended for children and we do not knowingly collect data relating to children.
- 3 It is important that you read this privacy policy so that you are fully aware of how and why we are using your data. We keep this privacy policy under regular review.
- 4 If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the our information rights officer using the details set out below:

Name: [Sophie Leighton]
Address: The Bethlem Gallery Bethlem Royal Hospital,
Monks Orchard Road, Beckenham, Bromley, BR3 3BX
E-mail: [Sophie.Leighton@bethlemgallery.com]

- 5 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.
- 6 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.

Third-party links

- 7 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 do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

- 8 **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 or anonymised data).
- 9 We may collect, use and store different kinds of personal data about you which we have grouped together as follows:
- **Identity Data** includes first name, last name, title, age and gender.
 - **Contact Data** includes address, email address and telephone numbers.
- 10 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 interested in a specific website feature. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, then we will treat the combined data as personal data which will be used in accordance with this privacy policy.
- 11 We **do not** collect any **Special Categories of Personal Data** about you (this includes for example details about your race or ethnicity, religious or philosophical beliefs and information about your health).
- 12 When donating through our website, you will be directed to Paypal to process donations on our behalf. Paypal gather and process any financial information (such as card details) required to make a donation, and you should read their privacy policy for information on how they do this. This financial information **is not** shared with us.

Cookies

- 13 Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.
- 14 You can set your browser not to accept cookies. Please visit www.aboutcookies.org to tell you how to remove cookies from your browser. If you do this you may find that some of our website features may not function as intended.

Other ways we collect data

- 15 **Google Analytics** – we collect information about browsing behaviour on our website so we can update it and ensure it is relevant for our audience. We anonymise and mask IP addresses and never store your full IP address.
- 16 **Social Media** – we collect publicly available information from Twitter, Instagram and

Facebook profiles, when users mention our handles, comment on or retweet our posts. We collect posts, handles, names and follower count. We process this information, under the lawful basis of Legitimate Interest – tracking engagement. We will use this information to manage our social media profiles, assess impact and recognise potential collaborators and prospects.

- 17 **E-mails** – we collect information from emails sent to our team members. We collect names, job titles and contact details of contacts that may qualify as leads or can contribute to our policy work.

Newsletters and marketing

- 18 If you opt in to receive our general newsletters you will receive information regarding gallery events, services and curated events with external organisations. We will collect information on open rates and click throughs to assess and improve our newsletters and any other information you provide whilst subscribing through our website.
- 19 You can easily unsubscribe from our newsletters by clicking on the link displayed at the bottom of each newsletter.
- 20 We may contact you with information regarding our events and offers, via email, post or phone, and in compliance with the direct marketing regulations. You have a right at any time to stop us from contacting you for marketing purposes, by writing to info@bethlemgallery.com or calling 020 3228 4101.

Third Parties

- 21 We use third party processors to collect, export, process and store personal data on our behalf. All our processors are compliant with the General Data Protection Regulations and you can view their websites for further detail:

Mailchimp: mailchimp.com/

Eventbrite: www.eventbrite.co.uk/

Big Cartel: www.bigcartel.com/

Google: google.com

Blue Cube: bluecube.tech/

Native Space: nativespace.com/

Global Payments: globalpaymentsinc.com/en-gb

Survey Monkey: surveymonkey.co.uk/

How we use your personal data

- 22 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- Where we need to perform a contract we are about to enter into or have entered into with you.
 - 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. 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.

- Where the processing of your personal data is necessary to comply with a legal obligation to which we are subject.

- 23 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 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.

International transfers

- 24 We do not transfer your personal data outside the UK.

Data security

- 25 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.
- 26 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.

Data retention

- 27 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.
- 28 Unless required by law or as set out above, we will generally delete your personal data 12 months after your last interaction with us.
- 29 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.

Your legal rights

- 30 You have rights under data protection laws in relation to your personal data. These rights are set out below. If you wish to exercise any of these rights set out above please contact us.
- 31 You will not 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.
- 32 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.

- 33 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.

Your Rights

You have the following rights:

- **Request access** to your personal data (a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data corrected. We may need to verify the accuracy of any new data you provide to us.
- **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. In some circumstances we may not be able to comply with an erasure request for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data. You have a right to object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which you believe causes such processing to adversely impact on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in certain scenarios, for example if you want us to establish the data's accuracy or where our use of the data is unlawful but you do not want us to erase it.
- **Request the transfer** of your personal data to you or to a third party. We will provide your personal data in a structured, commonly used, machine-readable format. 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.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. The lawfulness of any processing carried out before you withdraw your consent will not be affected. 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.