



**ROW BRITANNIA & BRITISH INSPIRATION TRUST PRIVACY AND COOKIE NOTICE**  
**OCTOBER 2019**

**PLEASE READ THIS NOTICE CAREFULLY. IT CONTAINS IMPORTANT INFORMATION ABOUT HOW WE PROCESS YOUR PERSONAL INFORMATION.**

**WHO WE ARE AND HOW WE APPROACH DATA PRIVACY**

We are The British Inspiration Trust, Charity Number: 1137795. registered Office c/o /o University of The Chichester, Bognor Regis Campus, Upper Bognor Road, West Sussex, PO21 1HR.

Our use of your personal information is regulated under the General Data Protection Regulation (Regulation (EU) 2016/679)) for as long as the United Kingdom is a member of the European Union or is subject to any transition arrangements after leaving the European Union, the Data Protection Act 2018 and any other privacy related laws or regulations the UK may implement as a result of it leaving the European Union. We are responsible as “Controller” for the purposes of those laws

We are committed to protecting and respecting the privacy of your personal information. We want you to be confident that your information will be properly protected whilst in our possession. If you have any questions about our use of your personal information, or you wish to exercise one of your rights under data protection legislation, please contact us. A summary of your rights is detailed in this notice.

**OUR WEBSITE**

This notice details how we use information you provide to us, including via the websites: <https://www.rowbritannia.org.uk/> and <https://www.britishinspirationtrust.org.uk> referred to in this notice as our **Site**.

The Sites 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 notice of every website you visit.

Unfortunately, the transmission of information through the internet is never completely secure. Although we do our best to protect your personal data at all times, we cannot guarantee the security of the data you send to us through our Site. Any transmission made is therefore at your own risk. Once we have received your information, we use strict procedures and security features to protect against unauthorised access.

**INFORMATION WE COLLECT FROM YOU AND THE PURPOSES FOR WHICH WE WILL USE IT**

We hope the following table helps you to understand what information we may collect, in what circumstances and how we use that information (including how long we retain it for).

Category of information	Where it comes from	What is collected and how we use that information	How long we will keep it for
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<b>Information you give to us (Voluntary information from direct interactions)</b>	This is information you give to us about you by:		
	<ul style="list-style-type: none"> <li>Signing up for an event, including the Row Britannia event</li> </ul>	First Name Last Name Address Telephone Number Email Address Name of Organisation Job Title	6 years
	<ul style="list-style-type: none"> <li>Contacting us with an enquiry about an event or some other issue.</li> </ul>	In order to process your enquiry we may ask you to provide contact information (name, address, telephone number and email).  It is in our <b>legitimate business interests</b> to process this information in order to deal with your enquiry/investigate the problem you've raised. We'll ensure your rights are protected.	6 years
<ul style="list-style-type: none"> <li>Business and charity contact information.</li> </ul>	We will keep: <ul style="list-style-type: none"> <li>a record of business contacts of our suppliers, advisers, agents and clients and their contact information in order to manage our relationship with that third party and perform contractual obligations (i.e. it is necessary for us to perform a <b>contract</b>);</li> <li>records of charity contacts we work with;</li> <li>a record of contacts from competent authorities and regulators linked to our industry, together with their contact information, in order to comply with a <b>legal obligation</b>; and</li> <li>a record of prospective business and charity contacts. This is in our <b>legitimate business interests</b> (i.e. we have a justifiable reason for processing information in this way).</li> </ul>	6 years	
<b>Information we collect about you and your device (automated technologies or interactions)</b>	Each time you visit our website we will automatically collect the following information:	Some online identifiers (such as static IP addresses) are your personal information.  We collect Device Information so that we can ensure adequate technical support for our website and ensure it is functioning properly	6 years

	<ul style="list-style-type: none"> <li>• technical information, including your operating system, and the browser you use (Device Information);</li> <li>• details of your use of our website including traffic data, the resources you use, where you have clicked through to our website from that of a third party, the domain name of the connecting website (<b>Log Information</b>);</li> </ul>	<p>on all operating systems/browsers. We want to ensure the content of our website is being presented to you in the most appropriate way to ensure it is easy to use/navigate. We also need this information in order to allow you to participate in interactive features on the website where you chose to do so.</p> <p>We collect Log Information so that we can better understand how our website is used and improve its functionality/content. We want to provide you with a customised service.</p> <p>These activities are in our <b>legitimate business interests</b> (i.e. we have a justifiable reason for processing your information in this way).</p> <p>We use cookies and on our Site:</p> <ul style="list-style-type: none"> <li>• a cookie is a small text file sent to your computer or device;</li> <li>• a pixel tag is an invisible tag placed on certain parts of our Site. It does not leave a footprint on your computer/device.</li> </ul> <p>Pixel tags and cookies work together to tailor the Site.</p> <p>You can manage this automatic collection of data by adjusting your cookie settings. More information can be found in how our How we use your cookies section (below) and <a href="http://www.allaboutcookies.org/">http://www.allaboutcookies.org/</a></p>	
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## Cookies

### How we use cookies

When you visit our website, we may store some information on your computer. This information will be in the form of a 'cookie' or similar file and can help us in many ways. For example, cookies allow us to tailor a website to better match your interests and preferences. With most internet browsers you can erase cookies from your computer hard drive, block all cookies or receive a warning before a cookie is stored.

### Google Analytics

We use [Google Analytics](#) first party cookies via a piece of JavaScript code which we have added to every page of our website to track it these are:

- \_\_utma Cookie
- \_\_utmb Cookie
- \_\_utmc Cookie
- \_\_utmz Cookie

- [\\_\\_utmv](#) Cookie

### **Google Analytics privacy overview**

#### **Google maps**

Used to store user preferences and information when viewing pages with Google maps on them.

- PREF
- NID

#### **Twitter**

We may use the Twitter “Follow Button” plugin to help us raise awareness of **The British Inspiration Trust (BRIT)** and **Row Britannia** using Twitter and Hashtags **#BRIT & #RowBritannia** The plugin detects whether you are logged in to Twitter when you visit our website and uses this information to present either a “Follow” or “You Follow” message with various other details from Twitter. Cookies we use are:

- [\\_\\_utma](#)
- [\\_\\_utmb](#)
- [\\_\\_utmc](#)
- [\\_\\_utmv](#)
- [\\_twitter\\_sess](#)
- [guest\\_id](#)
- [original\\_referer](#)
- [k](#)
- [pid](#)

If a visitor accesses our Website when not logged into Twitter, and a further cookie if accessed while logged on to Twitter. We use the plugin as a convenience for our users and we use it on the basis that Twitter adheres to its Privacy Policy. [Twitter privacy policy](#)

#### **Facebook**

We only use Facebook for campaigns, for their usage of cookies please see the [Facebook privacy policy](#)

#### **Instagram**

We only use Instagram for campaigns, for the usage of cookies please see the Instagram privacy policy <https://help.instagram.com/1896641480634370?ref=ig>

(please can this be written like the Facebook privacy policy link?)

Most of our cookies expire within 30 days, although our analytics cookies may persist for 2 years.

#### **How to reject or delete these cookies**

Further information on how to prevent cookies from being stored on your computer can be found on [All about cookies website](#) under the 'manage cookies' section.

#### **Do I have to provide this information?**

In most cases the personal information you provide to us in the table above is entirely voluntary. You are not under a statutory or contractual obligation to provide it to us.

However, where we need to collect personal data under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform our contract with you and you may not be able to participate in any event.

## **PROVIDING US WITH PERSONAL INFORMATION OF ANOTHER PERSON**

If you need to provide us with personal information about another person you must obtain that individual's **express consent** to pass us their information. You should share this notice with those individuals as it may also apply to them.

## **AUTOMATED DECISION-MAKING**

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

## **DATA SHARING**

### **Why might you share my personal information with third parties?**

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Carefully selected third parties who provide a service to us to support our core operations, such as: processing our mail, communicating with customers and prospective customers on our behalf (including via social media), running promotions, providing IT systems and administrative services and the development and improvement of internal systems and processes. This includes
  - a. [Quirkie]
- Competent authorities (statutory bodies, regulatory authorities, authorised bodies who have a role laid out by law);
- Other organisations where we are legally obligated to disclose your personal information (such as requests made in the prevention and detection of crime) or where disclosure is necessary to protect the property, rights and safety of us and our staff;
- Other companies where we are trialling products and services which we consider may improve our offering to customers and/or our business processes; and
- Other third parties where you have given your express **consent** or where we reasonably believe a third party is acting on your behalf.

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**

We do not transfer your personal data outside the United Kingdom and the European Economic Area (EEA).

## **DATA SECURITY**

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.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **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 Data Officer in writing.

### **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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may 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.

## **DATA PROTECTION OFFICER**

We have appointed a data representative 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

representative here The British Inspiration Trust, c/o University of Chichester, Bognor Regis Campus, Upper Bognor Road, West Sussex, PO21 1HR

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 NOTICE**

We keep this notice under regular review. Any changes we make to this notice will be posted on our Site with a prominent notice and, where appropriate, we will notify you by email.

If, in the future, we wish to use your personal information in a way not set out in this notice we will notify you and seek your permission to do so.

### **CONTACT US**

If you would like to request further information about this notice or the way in which we handle your personal information, please contact us at: The British Inspiration Trust, c/o University of Chichester, Bognor Regis Campus, Upper Bognor Road, West Sussex, PO21 1HR

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