

## DATA PROTECTION AND PRIVACY POLICY

The Jewellery Quarter Research Trust is fully committed towards protecting your privacy. The Jewellery Quarter Research Trust Privacy Policy explains our information practices and the various measures taken to protect your privacy and security with specific attention to any personal data we may have access to.

The Jewellery Quarter Research Trust Privacy Policy is fully compliant with the Data Protection Act 1998 and the Directive on Privacy and Electronic Communications 2002/58/EC, and other relevant business and personal legislation as well as The General Data Protection Regulation (GDPR) (EU) 2016/679.

### 1. WHO ARE WE?

In this policy references to the Jewellery Quarter Research Trust, JQRT or Trust, or to 'we' or 'us' are to the Jewellery Quarter Research Trust which is a not for profit volunteer trust governed by a 'Trust Deed'.

### 2. WHAT WE DO

The JQRT carries out research in a number of different ways and publishes the results online mainly but not exclusively in the form of a Digital Archive. Also, we organise events, tours and other activities to promote the work of the JQRT, the archive and community involvement.

### 3. LAWFUL PURPOSE

All data processed by the Trust must be carried out on one of the following lawful basis: -

- Consent
- Contract
- Legal Obligation
- Vital Interest
- Public Task
- Legitimate Interest

The bases for the JQRT processing "Supporter's" data (i.e. people with no other involvement in or with the JQRT) is "**Consent**".

The bases for the JQRT processing the data of Office Holders, volunteer's, or those who have expressed an interest in the work of the JQRT or of getting involved is "**Legitimate Interest**".

The bases for the JQRT processing the data of other organisations, charities, trusts, councils or any organisation or individuals acting in the same or a similar position is "**Legitimate Interest**".

You can get information about the Trust's "Legitimate Interest Assessment" (LIA) by contacting the Data Controller at the address below.

### 4. WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

#### What we need

The Jewellery Quarter Research Trust is what's known as the 'Data Controller' of the personal data you provide to us.

We also process data, so we are also a 'Data Processor'. There are a few selected third parties who process data for us mainly for mailing, donations and events management.

We will usually collect only basic personal data like name, email address, IP address and if you are over 18 years of age.

You may also give us a telephone number so that we can contact you if necessary. Also, it helps us if we know which country you are in.

If you are an office holder, such as a Trustee, Committee Member or Treasurer knowing your address, telephone number and any other relevant information is a requirement of holding office.

#### Why we need it

We collect personal data to further the aims and objectives of the JQRT as stated in the Trust Deed. This includes: -

- Collecting and recording details of office holders, volunteers and supporters;
- Trust administration;
- Organise Researchers and volunteers;
- Organise meetings, events and tours;
- Producing material for activities; including such items as name badges, lists, agenda and minutes;
- Sending all volunteers and supporters by email notices of meetings, events, newsletters, news and other information.

You do not have to disclose any information to use our sites or resources.

If you request help from us we keep a record of the request and our response, but if you are not already on our list we will not add your details to our supporters list unless you give us "Consent" to do so.

### Office Holders and Volunteers

If you hold an office or are a volunteer (or apply to be a volunteer), we have a "Legitimate Interest" to process your data and to keep you informed by sending you emails, newsletters and information about events and activities.

We will on occasion share your email address with other Trust volunteers, for instance in the process of organising an event.

### How we obtain your details

We collect personal information in a number of ways:

- When you provide it to us directly;
- When you provide permission to other organisations to share it with us (including Facebook or Twitter);
- When it has been given to a third party (including Eventbrite) and it was provided to us for lawful processing;
- From publicly available sources (such as, if we need to contact you and we look for a telephone number).

### Children

If you are under 18 please ensure you obtain your parent/guardian's consent before sending any personal information to the Jewellery Quarter Research Trust or before taking part in any activity or event. We will have activities for those under 18 so we may ask your age.

### Website Resources

You do not have to disclose any information to use our sites or resources.

If you send the JQRT an enquiry or request our help we keep a record of the request and our response.

If you are not already on our list we will not add your details to our supporters list unless you give us "Consent" to do so.

### Anything else?

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance, donations and event management your information may be situated outside of the European Economic Area (EEA). This will be done in accordance

with guidance issued by the Information Commissioner's Office.

## 5. LEGITIMATE INTERESTS

We have a number of lawful reasons that mean we can use (or 'process') your personal information.

One lawful reason is something called 'legitimate interests'. Broadly speaking Legitimate Interests means we can process your personal information if:

- We have a genuine and legitimate reason to do so *and*
- We are not harming any of your rights and interests.

## 6. SHARING YOUR INFORMATION

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations and the following:

- If you have agreed that we may do so.
- When we use other companies to provide services on our behalf, e.g. processing, mailing or event organisers.
- If we receive a complaint about any content you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights, property or personal safety of the Jewellery Quarter Research Trust, our websites or our visitors and for other lawful purposes.
- We may disclose aggregate statistics about our site visitors, supporters, and volunteers to reputable third parties and for other lawful purposes, but these statistics won't include any personally identifying information.
- If we run an event in partnership with other named organisations your details may need to be shared. We will be very clear what will happen to your data when you register.

We will never sell or rent your personal information to other organisations.

## 7. RETAINING YOUR INFORMATION

We hold your information only as long as necessary for each purpose we use it.

If you decide not to support the Trust any more or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials

in the future and to ensure that we don't accidentally duplicate information.

We may also need to keep some details for a period of time for legal or contractual reasons.

## 8. YOUR DETAILS ON THE WEB: OUR COOKIE POLICY

The JQRT does not use Cookies that collect or store personal information.

## 9. SECURITY

We take precautions to ensure the security of your personal information and strive to keep it accurate.

We have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification.

Access to Personal Information is restricted to authorised volunteers and service providers who need it to perform their work.

## 10. WHAT ARE YOUR RIGHTS?

A new data protection law, starting in May 2018, gives everyone a number of very important rights. These are:

- Transparency over how we use your personal information (**right to be informed**).
- Request a copy of the information we hold about you, which will be provided to you within one month (**right of access**).
- Update or amend the information we hold about you if it is wrong (**right of rectification**).
- Ask us to stop using your information (**right to restrict processing**).
- Ask us to remove your personal information from our records (**right to be 'forgotten'**).
- Object to the processing of your information for marketing purposes (**right to object**).
- Obtain and reuse your personal data for your own purposes (**right to data portability**).
- Not be subject to a decision when it is based on automated processing (**automated decision making and profiling**).

Some of these rights are not absolute (see item 7. RETAINING YOUR INFORMATION). If you would like to know more about your rights under the data protection law, see the Information

Commissioners Office website at <https://ico.org.uk/> .

Remember, you can use the 'unsubscribe' button to tell us you do not want us to send you any more newsletters or notice of events etc.

## 11. HOW TO CONTACT US

If you wish to talk through anything in our privacy policy, find out more about your rights or obtain a copy of the information we hold about you, please contact our Data Controller (details at the bottom of this page) who will be happy to help.

If you wish to raise a complaint on how we have handled your personal data, you can contact our data protection officer who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO) at <https://ico.org.uk/> .

Our data protection officer can be contacted by writing to:

The Data Controller  
Jewellery Quarter Research Trust  
66 Wheelers Lane  
Redditch  
Worcestershire  
B97 6GT

Or by emailing: [data@jqrt.org](mailto:data@jqrt.org)

If you wish to talk to us about anything in the policy or the information we hold about you, please contact our Data Controller:

By telephone: 0121 330 0318

By email: [data@jqrt.org](mailto:data@jqrt.org)

By post: -

The Data Controller  
Jewellery Quarter Research Trust  
66 Wheelers Lane  
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