

# WORSHIPFUL COMPANY OF INNOLDERS

## PRIVACY NOTICE

### **ABOUT THIS NOTICE**

The Worshipful Company of Innholders is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with data protection law. Please read it carefully.

Data protection law says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

If you have any questions about this notice or how we collect and use personal information about you please contact us.

### **1 INFORMATION ABOUT US**

- 1.1 We are the Worshipful Company of Innholders, a company incorporated by Royal Charter. Our address is 29-30 College St, London EC4R 2RH and our company number is RC000930.
- 1.2 We also have an associated charity the Innholders' Charitable Foundation, registered charity number 1158457. This privacy notice also applies to the activities of the Innholders' Charitable Foundation.
- 1.3 If you have any questions, you can contact us using the details at <https://www.innholders.org.uk/contact> or by emailing us at: [mail@innholders.co.uk](mailto:mail@innholders.co.uk)

### **2 MEMBERS, DONORS AND CHARITY APPLICANTS**

- 2.1 **If you are an individual, when you apply to become a member or donor or make a charity application or receive a bursary, or someone else does this on your behalf,** there will be personal information about you relating to that process such as your name, contact details, information about your profession or education, other details you provide as part of any membership or application or donation, and details we may need to reimburse you for expenditure.
- 2.2 If you are an individual, we need certain information to consider and/or provide your membership, accept your donation, consider your application, or provide your bursary and you must provide this in order for us to do this, if you do not, we may not be able to do so. Mandatory information fields are generally set out in our relevant forms, but in particular, you must provide your name and contact details, details of your profession and other personal information when becoming a member.

- 2.3 **Other correspondence or interaction** (for example by email, telephone, post, SMS or via our website) between you and us, will include personal information (such as names and contact details) in that correspondence. This may include enquiries, follow-up comments or complaints lodged by or against you and disputes with you or your organisation.
- 2.4 **Social media.** If we engage with you on social media, we may use information you share with us (including your social media handle or profile) or which is available from your account to inform our correspondence with you.
- 2.5 **Member database.** We keep a membership directory which allows our members to look up information about other members. We make this available as necessary for our and our members' legitimate interests in sharing member information and building links between our members. If you do not wish your information to be available to other members, you can change your settings by logging into your account on our website.
- 2.6 **Committee Minutes.** We keep minutes of our Court of Assistants and its committee meetings. These may make reference to some of the information that you have provided in order to record decisions about applications for membership, donations and bursaries, and other Company or Charity business. These minutes form part of the Company's archive and may be retained indefinitely.
- 2.7 **Company Newsletters, Annual Reviews and Annual Reports.** We produce various printed and on-line communications to inform our members of the activities of the Company and its members. Your participation in Company events may be reported and photographs of events may be included. If you do not wish your presence at events to be mentioned or images of you published you may let the Clerk's Office know and we will follow your instructions.
- 2.8 **Notifications.** As part of your membership or your relationship with us we may provide you with information about our activities or events. We use your contact details to provide this as necessary for our legitimate interests in keeping you informed. You can unsubscribe from these notifications at any time by contacting us.
- 2.9 **Membership** We will keep and use your information to administer your membership or otherwise carry out our contract with you (if applicable), to comply with any legal requirements for us to maintain certain records or carry out certain verifications and money laundering checks, and/or for our legitimate interests in preventing fraud, dealing with a complaint or enquiry and administering your (or your organisation's) account and any services we offer, as well as to review and improve our offerings, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- 2.10 **Where your information relates to membership,** it is kept for a period for the duration of your membership and thereafter to ensure we have an accurate record of our historic membership.
- 2.11 **Where your information relates to a donation,** it is kept for up to 7 years after your last donation to ensure we have an accurate record of our donations and for tax and compliance purposes.
- 2.12 **Where your information relates to a charity application or bursary,** it is kept for up to 7 years after your last application or the end of your bursary to ensure we have an accurate record of our applications and bursaries and for tax and compliance purposes.
- 2.13 **Payment information** may be collected by our payment card processing provider and is retained by them in accordance with their record keeping policies. Other payment information may be kept by us to enable payments to be made to you for up to 3 years from the last

payment transaction in our on-line banking system. Records of previous banking transactions are retained for record keeping purposes only.

- 2.14 If your information is on social media, it will be retained in accordance with the relevant social media platform's policies. Any other information set out above such as initial enquiries or correspondence which doesn't relate to a member or donor is kept for up to 4 years after your last correspondence with us.

### 3 WEBSITE INFORMATION

- 3.1 **We may collect information about you and your use of our website** via technical means such as cookies, webpage counters and other analytics tools. This may include your IP address, 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 a website as well as the date and time of your access, what you interact with on our website, and the website from which access is made. We use this as necessary for our legitimate interests in administering and improving our website and its content, to ensure it operates effectively and securely, to develop our business and inform our marketing strategy, and for other administrative purposes. We may also create aggregate statistical data from that information (for instance, overall numbers of website visitors) which is not personal information about you.
- 3.2 For detailed information on the cookies on our site and the purposes which they are used for see our Cookie Notice.
- 3.3 We keep this website information about you for up to 36 months from when it is collected or the relevant cookie expires.
- 3.4 **Third party websites.** Our website may, from time to time, contain 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.

### 4 PHOTOS, CONTENT AND PROMOTIONAL MATERIAL

- 4.1 This is information about you which you provide to us (whether through our website or otherwise), or images or recordings of you which you allow us (or someone on our behalf) to take (including at our premises or events), for publication or display. This may include reviews, comments, testimonials, photographs (including stock photos and advertising material) and videos.
- 4.2 We may display and publish this content (and, if relevant, attribute it to you) on our platforms as necessary for our legitimate interests in providing content and for promotional purposes (or, in some circumstances, because you have specifically consented to us doing this). This information is kept and published or displayed by us for as long as we consider it relevant for those purposes. You can ask us to remove or delete your content at any time (subject to any agreements about our right to use it) by contacting us. If we are displaying or publishing the information based on your consent, you have the right to withdraw that consent at any time.

### 5 PROFESSIONAL INFORMATION

- 5.1 If you work for one of our suppliers, charity beneficiaries or business partners, the information we collect about you may include your contact information, details of your employment and our relationship with you. This information may be collected directly from you, or provided

by your organisation. Your organisation should have informed you that your information would be provided to us, and directed you to this policy. We use this as necessary for our legitimate interests in managing our relationship with your organisation. If we have a business or charity relationship with you or your organisation, we may receive information about you from your organisation.

5.2 We keep this information for up to seven years after the end of our relationship with your organisation.

## 6 VISITOR INFORMATION

6.1 **Visitor information.** We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. If you have an accident at our premises, this may include an account of your accident. Visitor information is kept for a period of up to 12 months. If you have an accident on our premises, our accident records are retained for a further period until we are confident they are not required in relation to any legal claims.

6.2 **CCTV.** We operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes. CCTV recordings may be kept for a period of up to 30 days (unless an incident occurs and it is necessary for us to keep recordings for longer to properly deal with it).

6.3 We use the information above as necessary for our legitimate interests in administering your visit, ensuring site security and visitor safety.

## 7 EVENT INFORMATION

7.1 If you attend an event we operate, we will collect information about you such as your name, the capacity in which you are attending the event, dietary preferences and accessibility requirements.

7.2 We use this information as necessary for our legitimate interests in operating and administering the event and any related issues, as well as to ensure we respect your dietary requirements, make reasonable adjustments for any accessibility requirements, and fulfil any contract we have with you. Information about your dietary requirements and accessibility requirements is used on the basis that you have made it public to use for this purpose, for your vital interests (where they are health-related) and (in some circumstances) on the basis of your explicit consent.

7.3 We retain this information for up to 7 years after the last event you attended, in order to keep an accurate record of our events and address any complaints or claims arising out of an event.

7.4 Some of our events will be managed and run by third party catering providers. In that case we may share the information that we have collected with those providers, and they may also collect and use your data in accordance with their own privacy notices. For events at our premises the privacy notice at [innholders.co.uk](http://innholders.co.uk) will apply.

## 8 APPLICATIONS, REFEREES AND EMERGENCY CONTACTS

- 8.1 We will collect and hold information on job applicants (including applications for work experience or internships), including information you provide to us in your application, or is provided to us by recruitment agencies, as well as information on you from any referees you provide. We may also collect information about your professional history which you make available on LinkedIn, or which are on your employer's website.
- 8.2 We use this as necessary to enter into an employment contract with you, and for our legitimate interests in evaluating candidates and recording our recruitment activities, and as necessary to exercise and perform our employment law obligations and rights. Where you voluntarily provide us with special categories of data, such as information about your race, health or sexuality, we will store this as part of your application on the basis that you have decided to make it public to us for this purpose, and to ensure that our record of your application is accurate so we can comply with (and demonstrate our compliance with) our obligations under employment law.
- 8.3 If you are successful in your application, your information will be used and kept in accordance with our internal privacy notice. If you currently work for us, or used to work for us, you can request a copy of this from us. If you are not successful in your application, your information will be held for up to 6 months after the relevant round of recruitment has finished.
- 8.4 You must provide certain information (such as your name, contact details, professional and educational history) for us to consider your application fully. If you have not provided all of this information, we may contact you to ask for it. If you do not wish to provide this information, we may not be able to properly consider your application.
- 8.5 If you are listed as a referee by an applicant, we will hold your name, contact details, professional information about you (such as your employer and job title) and details of your relationship with the applicant. We will use this information as necessary for our legitimate interests in evaluating candidates and as necessary to exercise and perform our employment law obligations and rights. Your information will be kept alongside the applicant's information.
- 8.6 If you are listed as an emergency contact by someone who works for us, we will hold your name, contact details and details of your relationship with that member of staff. We will use this to contact you as necessary to carry out our obligations under employment law, to protect the vital interests of that member of staff, and for our legitimate interests in administering our relationship with that worker. Your information will be kept until it is updated by that member of staff, or we no longer need to contact them after they have stopped working for us.

## 9 LEGAL CLAIMS

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim.

## 10 WHY ELSE DO WE USE YOUR INFORMATION?

- 10.1 **Common uses of your information.** We will only use your personal information when the law allows us to do so. Although in limited circumstances we may use your information because you have specifically consented to it, we generally use your information in the ways set out in this notice because:

- 10.1.1 we need to perform a contract we have entered into with you.
- 10.1.2 we need to comply with a legal obligation.
- 10.1.3 it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests.
- 10.1.4 we need to protect your interests (or someone else's interests) or where it is needed in the public interest (although these circumstances are likely to be rare).

10.2 **Change of purpose.** We will only use your personal information for the purposes for which we collected it as set out in this notice, 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## 11 INFORMATION WE RECEIVE FROM THIRD PARTIES

11.1 We may also receive information about you from the following sources:

11.1.1 **Our service providers.** We work closely with third parties (including, for example, business partners, charities, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) who may provide us with information about you, to be used as set out in this privacy notice.

11.1.2 **Publicly available sources.** If relevant as part of our relationship with you, we may obtain information from publicly available sources such as search results or LinkedIn.

## 12 SHARING YOUR INFORMATION

12.1 **We never sell your data to third parties.** But we may need to share your information with third parties, including third-party service providers. Third parties are required to respect the security of your personal information and to treat it in accordance with the law.

12.2 **Why might we share your personal information with third parties?** We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our members, or others or where we have another legitimate interest in doing so. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

12.3 **Which third-party service providers process your personal information?** We may need to share your personal information with third-party service providers (including contractors and designated agents) so that they can carry out their services. We may use third-party service providers in relation to the following types of activity: legal advice, contract administration, administration, IT services, payment processing.

12.4 **How secure is your information with third-party service providers?** All our third-party service providers are required to take appropriate security measures to protect your personal information. Where third parties process your personal information on our behalf as "data processors" they must do so only on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

- 12.5 **What about other third parties?** We may also need to share your personal information with a regulator or to otherwise comply with the law.

## 13 **WHERE WE STORE YOUR INFORMATION**

- 13.1 Our office headquarters are based in London and our main data centre is located in the UK. However, where required to perform our contract with you or for our wider business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside the UK and the EU. It may also be processed by staff operating outside the UK and EU who work for us or for one of our service providers.
- 13.2 We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice.
- 13.3 Some countries or organisations outside of the UK and the EU which we may transfer your information to will have an "adequacy decision" in place, meaning the EU considers them to have an adequate data protection regime in place. These are set out on the European Commission website: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).
- 13.4 If we transfer data to countries or organisations outside of the UK and the EU which the EU does not consider to have an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by the EU or a data protection authority) are put in place where required. To obtain more details of these safeguards, please contact us.

## 14 **DATA SECURITY**

- 14.1 As well as the measures set out above in relation to sharing of your information, we have put in place appropriate internal 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.
- 14.2 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 necessary.

## 15 **HOW LONG WILL WE KEEP YOUR INFORMATION FOR?**

- 15.1 We have set out above indications of how long we generally keep your information. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, or for operational reasons as our deletion processes are run periodically rather than continuously.
- 15.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 15.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 16 YOUR RIGHTS

- 16.1 Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office (ICO). Under certain circumstances, by law you have the right to:
- 16.1.1 **Be informed** in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
  - 16.1.2 **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.
  - 16.1.3 **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.
  - 16.1.4 **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 (for instance, we may need to continue using your personal data to comply with our legal obligations). 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).
  - 16.1.5 **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 us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
  - 16.1.6 **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.
  - 16.1.7 **Request the transfer** of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
  - 16.1.8 **Withdraw consent.** In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another compelling legitimate interest in doing so.
  - 16.1.9 **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with



your national data protection supervisory authority (if you are in the UK, this will be the ICO).

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please contact us.

- 16.2 **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.
- 16.3 **What we may need from you.** We may need to request specific information from you to help us understand the nature of your request, to 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. If we request any identification from you for this purpose, it is on the basis that it is necessary to comply with our legal obligations, and we will only keep and use this until your identity has been verified.
- 16.4 **Timescale.** Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

## 17 **CHANGES TO THIS PRIVACY NOTICE**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice.

DATE: August 2023