

The Wallace Collection

Privacy Policy

About this policy

This policy describes how we use your personal data when you use our website (www.wallacecollection.org), including purchasing goods through our online shop, or engage with us to enjoy, learn about or support our art collection. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

You can read and print out this whole policy or click on the links below to see specific information about:

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The Wallace Collection

Who we are and how you can contact us

You know us as the Wallace Collection. When we refer to The Wallace Collection, this means [insert legal entity name], a [insert form of legal entity and registered number if applicable] [and [insert details of further legal entities if more than one]].

You can contact us in writing at Hertford House, Manchester Square, London, W1U 3BN or by emailing DataOfficer@wallacecollection.org. If you would like to speak to us please call us on + 44 (0)20 7563 9512.

What personal data we collect about you

We collect:

- **personal data that you provide to us.** There are lots of ways in which you may share your personal data with us, for example, you may visit our website, make a purchase from our online shop, contact us with questions about our collection, post on social media sites that we run, arrange to hire Hertford House for an event, become a member or donor or attend our events. The personal data that you provide to us may include your name, address, e-mail address and phone number as well as financial and credit card information, family relationships, date of birth and interests.
- **personal data that we receive from third parties.** If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. For example, we may receive feedback from a sub-contractor we have instructed to help us provide you with goods or services that you have requested such as a courier company.
- **personal data about your use of our website.** This is technical information and includes details such as your IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our website and where you went when you left, what pages or products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and any phone number used to call our customer service number.

What we use your personal data for

We use your personal data in the following ways:

- **personal data that you provide to us** is used to:

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- provide you with the information, products and services that you request from us
- provide you with marketing information, including details of future events and activities and opportunities to support the Wallace Collection, in accordance with your marketing preferences (see [How we use your personal data for marketing](#))
- manage and administer the Wallace Collection
- review and improve our goods and service
- to further our charitable aims, including undertaking fundraising activities
- to inform on future events and activities at the Wallace Collection
- **personal data that we receive from third parties** is combined with the personal data that you provide to us and used for the purposes described above.
- **personal data about your use of our website** is used to:
 - administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
 - to improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device
 - to allow you to participate in interactive features of our service, when you choose to do so
 - as part of our efforts to keep our site safe and secure
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or opportunities to support the Wallace Collection

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#)

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When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- we are entering into and carrying out our obligations under a contract with you e.g. to provide you with good you purchase from our online shop
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights

In some circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will explain to you how we wish to use your data and ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

Please refer to the section on [How we use your personal data for marketing](#) to read about marketing consents.

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our goods or services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter “**Subject Access Request**” and send it to us by post or email using the details in the [Who we are and how you can contact us](#) section.

You also have rights to:

- prevent your personal data being used for marketing purposes (see [How we use your personal data for marketing](#) for further details)
- have inaccurate personal data corrected, blocked or erased
- object to decisions being made about you by automated means or to your personal data being used for profiling purposes

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- object to our using your personal data in ways that are likely to cause you damage or distress
- restrict our use of your personal data
- require that we delete your personal data
- require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file

You can find full details of your personal data rights on the Information Commissioner's Office website at [ww.ico.org.uk](http://www.ico.org.uk).

Automated decision making and profiling

We may analyse your data in order to continue to improve our understanding of our target audiences and of our supporters. This is with a view to providing world class, transformative, visitor-focused experiences, customer service and educational engagement, and to look at ways in which we might in the future use the latest technologies to improve and personalise the services that we offer.

As part of this, we may analyse personal information collected from you, and occasionally from third parties, to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information.

You are entitled to ask that we do not make automated decisions about you or use your personal data for profiling purposes. Please refer to the section on [Your rights to know what personal data we hold and to control how we use it](#) for details on how to exercise your rights.

When we will share your personal data with others

We share your data with the following people in the day to day running our business:

- any business partners, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from us
- advertisers and advertising networks (see [How we use your personal data for marketing](#) for more information)
- analytics and search engine providers that assist us in the improvement and optimisation of our site
- The Wallace Collection in America

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We may also share your personal information with third parties on a one-off basis, for example, if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the terms of any contract we enter into with you and other agreements or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- storing your personal data on our secure servers
- encrypting any payment transactions made through our website
- ensuring that our staff receive regular data security awareness training
- keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems
- enforcing a strict policy on the use of mobile devices and out of office working

Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. Please do not to share your passwords with anyone.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

- you make an enquiry about our goods or services
- you buy our goods or services

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- you have told a third party that you would like them to pass us your contact details so that we can send you updates about our goods and services
- you have notified us when providing your personal data that you would like to receive marketing communications from us.

We may send you marketing communications by email, telephone, automated calls, text message or post.

You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), about specific subjects (for example you may wish to receive notifications of special events but prefer not to receive requests for donations or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when we first collect your data. You can check and update your current marketing preferences at any time by calling or emailing us using the details set out in the [Who we are and how you can contact us](#) section above.

We will only share your personal data with third parties for marketing purposes if you provide us with your consent to do so by ticking a box on a form we use to collect your personal data.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. The current database of donors/supporters is stored on a cloud system based in the US with a supplier who is registered under the Privacy Shield, monitored and enforced by the U.S. Department of Commerce and Federal Trade and compliant with European and Swiss data protection authorities. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Following an expression of legitimate interest in the Wallace Collection's activities, if you are an US resident or have strong connections with the USA, we may seek your consent to share your information with the Wallace Collection in America inc., a Foundation run by a board of trustees and a registered 501(c)3 organisation encouraging tax-deductible gifts under US law, to advertise specific US-based events and facilitate possible future donations. Any sharing of data in these circumstances is subject to strict agreements with the Wallace Collection that ensure that the highest standards when collecting and using personal data are met.

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How long we keep your personal data

We only keep your personal data for as long as we actually need it. By way of example, we will keep:

- for marketing purposes a record of public event bookers whilst active and then delete two years after the last event booked.
- a record of Members' and Benefactors' details as long as the contact is active and for two years after membership lapses or is cancelled.

A full copy of our retention schedule is available on request.

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

How you can make a complaint

If you are unhappy with the way we have used your personal data please contact us using the contact details set out in the [Who we are and how you can contact us](#) section above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website or you can contact us (see [Who we are and how to contact us](#)) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the end of the policy and the date on which that version of the policy came into force.

In line with the Information Commissioner's Office's guidelines, in the event of a personal data breach that is likely to result in a high risk to the rights and freedoms of individuals, the breach will be reported to the Information Commissioner's Officer and to those directly concerned.

This is policy (version 1) came into effect on 10th May 2018.