



PRIVACY STATEMENT

HCT respects your privacy and is committed to protecting your personal data. We are publishing this Privacy Policy to let you know what happens to your personal data when you visit our website and also when you sign up to our newsletters or become a Friend of Hay Castle. We also set out your privacy rights and how the law protects you.

1 Important information and who we are

Controller

Hay Castle Trust is the controller of and responsible for your personal data (collectively referred to as "HCT", "we", "us", "our").

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Hay Castle team using the contact details set out below.

Contact details

Full name of legal entity: Hay Castle Trust Ltd.

Charity no: 1144524

Company no: 07639471

Email address: info@haycastletrust.org

Postal address: Hay Castle, Hay on Wye, HR3 5DG

Telephone number: 01497 820079

Changes

We keep our privacy policy under regular review and may change it at any time to reflect changes in the way we operate or to supplement it as necessary.

Your personal data

We do our best to ensure that the personal data we hold about you is accurate and up to date. Please keep us informed of any changes so that we can update our records.

Third-party links

Our 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-parties and are not responsible for the way they deal with your personal data. We encourage you to read the privacy policy of every website you visit.

2 The data we collect about you

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 (anonymised data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** may include first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** may include postal address, email address and telephone numbers.

- **Financial Data** may include bank account and payment card details, for example, if we (or a third party on our behalf) process subscriptions from you.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

3 How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our services or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Third parties.** This would include contact, financial and transaction Data from providers of technical, payment and delivery services (such as PayPal, Mailchimp).

4 How we use your personal data

We will only use your personal data when the law allows us to. By way of example, we will use your personal data in the following circumstances:

- Where you have asked us to provide a service to you or we need to perform a contract we 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.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us as set out above (Contact Details).

Purposes for which we will use your personal data

We have set out below all the ways we may use your personal data and, in each case, which of the legal justifications we rely on to do so. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

You will see references to our **legitimate interest**. This is a legal term which means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We always consider and balance any potential impact on you (both positive and negative) and your legal rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new subscriber to our newsletters or as a Friend of Hay Castle	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to enter a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

Marketing and offers from us

You will receive marketing communications from us if you have requested information from us or paid for any services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any third party for marketing purposes unless you have expressly consented to our doing so.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time (see Contact Details).

Cookies

We do not currently collect data through cookies. We will inform you when and if this changes.

Change of purpose

We will only use your personal data for the purposes for which we collected it. 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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- External Third Parties: e.g., Mailchimp, payment processors, delivery services.
- 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.

6 International transfers

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

7 Data security

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 individuals employed by or associated with HCT (e.g. the trustees) who need access to it to fulfil their roles. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

If we experience any suspected personal data breach we will notify you and any applicable regulator where we are legally required to do so.

8 Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see the section on your legal rights below for further information.

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.

9 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

These include the rights to:

- request access to your personal data
- request correction of your personal data
- request erasure of your personal data

Governance

- object to processing of your personal data
- withdraw any consent you have given us.

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.

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.

We try to respond to all 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.

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 (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.

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