



The Lord's Taverners Limited ("the Charity"), which includes the Lady Taverners, Lord's Taverners Kit Recycling Limited, Brian Johnston Memorial Trust and Lord's Taverners Enterprises Limited regards the protection and respect of personal information as one of its fundamental commitments.

The purpose of this Privacy Policy (together with other documents that may be published from time to time such as Terms and Conditions and other policies referred to herein) is to set out the basis on which any personal data that we either receive from you, or we receive in respect of you from a third party, is managed by the Lord's Taverners Limited.

Queries and Who to contact

The Data Controller, the organisation that is ultimately responsible for managing the personal data held by the Charity (which includes the Lord's Taverners, the Lady Taverners, Lord's Taverners Kit Recycling, Brian Johnston Memorial Trust and Lord's Taverners Enterprises Limited) is the Lord's Taverners Limited (Company Number 582579) of 90 Chancery Lane, London, WC2A 1EU.

The Lord's Taverners appoint a Data Protection Officer who is responsible for overseeing questions relating to this Privacy Policy and how it is implemented. If you have any questions or concerns arising from the Policy, or wish to exercise your rights in relation to data protection then this would be your first point of contact:

Tim Berg, Chief Operating Officer
Lord's Taverners
90 Chancery Lane, London WC2A 1EU
tim.berg@lordstaverners.org

Changes to this Privacy Policy

We review the Privacy Policy from time to time in the light of current legislation, practices and guidelines and any updates to this policy will be reflected on this page and, where relevant, may also be emailed to you. We would recommend that you refer to this policy periodically to see any changes or updates to the policy.

Date last updated: 24th May 2018

Introduction

The Lord's Taverners hold personal data in relation to a wide range of individuals and more detailed information on some of those categories (Members, Beneficiaries, and Supporters) is available to you at the end of this document. There are some fundamental principles that we apply to every category of individual and these are set out as follows.

What is Personal data?

Personal data is defined as any information relating to an identifiable person who can be directly or indirectly identified in particular reference to an identifier. It includes digital, paper, and image based data.

Indirect identification refers to the fact that if personal information that we hold, when matched with other information held, can then lead to the individual being identified then it is personal data.

Information that we may hold about you is dependent upon the purpose for which such information is held, and broadly would fall into one of the following categories:

Identification – name, date of birth, gender, identification number (such as customer number or Membership number)

Contact – address, email, telephone, and mobile numbers

Financial – bank or other information to be able to process financial transactions as required

Activity - being transactions undertaken, events attended, and other interactions with us

Profile – interests, history of support for the Charity, and survey responses

Communications – how you would like marketing and other information provided to you.

Processing of personal data

We do not process personal data against third party databases for the purposes of profiling, gathering additional personal data, or other similar purposes. We may from time to time perform ad-hoc activities, for example to verify the existence of postal addresses against the anonymous Royal Mail database where posted information has been returned as undeliverable, or to review the Honours list to see whether we identify supporters who have been recognised.

Sharing personal data

We do not share personal data with third parties for commercial purposes. In particular we do not share your personal data with our programme partners or our event sponsors unless we gain your specific consent so to do.

We do share your personal data for administrative purposes and fulfil our commitments to you. Further details are included in each of the categories of individual, however in general this sharing will be with mailing houses, our bank (to facilitate payments for example), Electoral Reform Services (for mailing and also administration of Annual General Meetings), and other similar organisations.

Any organisation with whom we share your personal data is required to have a written agreement with us confirming their compliance with current legislation relating to the management of personal data including the General Data Protection Regulations (“GDPR”) 2018.

Keeping your personal data

We will only retain your personal data for as long as is necessary for us to fulfil the purposes for which it was collected. How long that period of retention should be is a matter of judgment, and in considering this period we take into account a number of factors:

- The nature and sensitivity of the data we hold;
- The risk of harm from unauthorised use or disclosure;
- The purposes for which we gathered your data;
- Applicable law;
- Our obligations to maintain its accuracy.

Where the data is related to financial transactions there is an obligation under law to retain certain identifiable information for at least six years currently.

We may anonymise your data (for example where we wish to aggregate historic data for statistical purposes), at which point it is no longer personal data as it cannot be attributed to an individual.

Sensitive Personal Data

We may request from you Sensitive Personal Data (which may include information about Health, Religion, Political Beliefs, Ethnicity, etc) which could be, for example, to note dietary requirements, or provide more focussed information in relation to the impact of our charitable activities. We will always gain your specific consent to retain this sensitive personal data on our systems, which will be maintained securely.

Data Security

We take data security seriously and have in place a series of controls to prevent wherever possible the unauthorised use, access or disclosure of your personal data, or its accidental loss.

We also restrict access to your personal data to those employees, officials, agents, contractors, and third parties who have a requirement to know in order to fulfil their obligations within the organisation. Where they have such access they do so under an agreement of confidentiality and also based on instructions that we may provide either within a contract with those third parties or by direct instruction.

Your personal data is stored on secure servers, either held by us or with third parties within a cloud environment, with rotating password protection. Payment information (such as via banks) has highly restricted access and credit card information, where transactions are processed by the Charity, is not retained by us.

Where you make use of our webshop or other online services, which may involve you creating your own password, you are responsible for keeping that password secure and confidential.

Your rights

As an individual you have a number of rights in relation to the personal data that we hold. The principle rights are as follows:

To request correction of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

To request erasure of your personal data. This allows you to ask us to delete some or all of the personal data held by us about you where there is not a good reason for us continuing to hold that data. Such reasons could include legal requirements or contractual responsibilities.

To withdraw consent at any time to us using your personal data for the purposes for which it was originally passed to us. You should be aware that any use of your personal data prior to the date of withdrawal of consent remains a valid use and that subsequently you may not receive information about the organisation.

To access your personal data (known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it. Any such request should be directed to the Data Protection Officer. A basic request will not result in a fee unless your request is unfounded, repetitive or excessive. We may seek to verify your identity to ensure it corresponds with data we hold as a security measure, and generally we would look to respond within one month.

You have other rights to restrict or object to processing of personal data (which we do not undertake other than for administrative purposes), and request the transfer of your data in a suitable format to a third party (applies only to automated information).

Third Party links on our websites

Our websites enable individual users to click on links that take them to the website of third parties such as sponsors, programme partners, affiliated organisations, and others. You should be aware that that once you do this you will be subject to the privacy policies of those third party organisations and we do not take any responsibility or liability for those policies. We therefore advise that you make yourself familiar with those policies before you provide third party information to them.

Cookies and URLs (Unique Resource Locators)

We use cookies, URLs, and other similar user information for the purposes of providing statistical data on the usage of our web and other digital channels. This data is quantitative and may include geographic and other limited demographic information.

We do not use cookies or URL information for the purposes of identifying individual users, or for providing a basis for a tailored experience to you.

Specific User Groups

Members

What information do we hold?

We will hold your contact information, name, address, email, telephone, and Membership number and status. If you provide it we will also hold other information such as date of birth, interests, membership of our golf and bridge societies, and other similar information.

Why do we hold it?

We hold your information under a contractual relationship – in return for membership of the Lord's Taverners and Lady Taverners you expect to receive information about the Charity, the events we run, charitable activities that you can attend, and other similar information. In addition individuals who are Members of either the Lord's Taverners or the Lady Taverners are entitled, based on their membership category, to receive information about AGMs / General Meetings, amendments to articles and Bye-laws, elections for Trustees or to Council, and other matters of a governance nature.

Do we share information?

We only share your data with organisations for the purposes of undertaking the administrative functions that go with the purposes outlined above. For example with Electoral Reform Services who manage our election processes and mailing relating to the AGM, Trio who undertake events mailings, and Mailchimp who manage our emails. Each organisation would have an agreement with us which sets out the basis on which information is passed to them and limits their ability to use that data to administration only.

We also have traditionally shared our Member data with other Members – via the printed Members Handbook. Individuals have opted out of having certain of their information included in the handbook.

In the light of GDPR we will be introducing a Members area to the website later in 2018, and it is within this environment that Members will be able to securely look for contact details of Members.

We do not as a rule share personal data with any of our commercial partners. We may, for example, allow a commercial partner to run a business card draw at an event and this would be clearly notified to those present that in entering they would be passing their data to a third party.

Data Processing

We do not process your information against databases for the purposes of gaining additional demographic or other information (for example in relation to wealth assessments, or at the database level to identify alternate contact information). If we, or a mailing house, have difficulty with an address we may verify it against anonymous Royal Mail or similar databases to establish that the address we hold it is in a recognisable form, or that a postcode exists.

Although we would not process our databases against third party databases of company or trusts, if we become aware that a Member may be connected to an organisation we have identified as being potentially interested in our work, we may contact the Member for further information and/or guidance.

Sensitive Personal Data

Should we request information from you which would be classified as sensitive personal data (for example if you have particular dietary requirements, or have issues around access to buildings) then we would seek your express permission to retain that information on our system.

Beneficiaries

What information do we hold?

We will hold your name, date of birth, and contact information. In addition we will maintain information about your attendances, survey results, participation, and information about your progress.

Why do we hold it?

We hold your information primarily for the purposes of evaluating how our charitable activity helps you develop as an individual, the opportunities we are able to provide for you, and the way in which our activity may impact upon your life and the lives of those around you.

This we regard as a legitimate interest in order to provide us with the relevant information to be able to demonstrate the impact that our programmes have, and also to be able to refine and improve them to help more current and potential beneficiaries.

We may also capture images of you participating in one of our programmes or benefitting from one of our grants. Where we do so we do obtain either the consent of the school or organisation that we have participated, or we obtain your direct consent to be able to retain and use those images.

If we look to create a case study, or have more prominent images of you that we wish to use as part of our marketing and communications (either in paper or through digital channels) then we would obtain your express written consent to the use of those images.

A number of our beneficiaries are defined as “children” under relevant legislation and where this is the case we would seek consent wherever possible from parents, guardians or other close responsible adults where we considered consent to be appropriate.

Do we share information?

Beneficiary personal data is shared with coaches who are involved in our programmes and are generally held within programme management databases to enable us to retain and aggregate data about the impact that our charitable activity has. These sorts of arrangements are under contracts which respect the confidentiality of such data and do not permit the third party organisations to use the personal data for other purposes.

Unless we have specific consent (as in the event of, for example, a case study) we do not share personal data regarding individual beneficiaries with third parties.

Data Processing

We do not process your information against databases for the purposes of gaining additional demographic or other information in a manner whereby your data is identified. In evaluating the impact of our programmes we may process anonymised data against third party databases in order to provide insight as to the impact our charitable activity is having against general demographic background trends.

Sensitive Personal Data

A number of our programmes are designed to reach disadvantaged and disabled young people. As a consequence we gather data on a regular basis in relation to you which would be regarded as sensitive – health, background, religion, and other similar characteristics. This we do on the basis of our legitimate interest in assessing the impact we have on the lives of those beneficiaries we support.

We pay particular attention to the security aspects of sensitive personal data within our overall attitude to personal data.

Supporters and Donors (other than Members)

What information do we hold?

We will hold your contact information, name, address, email, telephone, and preferences to the extent we have been given that information by you. This information would be passed to us (with the relevant consent) via a range of means including, but not limited to, raffle tickets, business card draws, certain social media, business cards, our websites, sponsorship of individuals participating in our challenge events, online donations, or other similar activities.

Why do we hold it?

We hold your information for the purposes of communicating with you about our events and activities, about our charitable programmes and to provide you with other news that we would consider relevant to the consent that you have provided.

Do we share information?

We only share your data with organisations for the purposes of undertaking the administrative functions that go with the purposes outlined above. For example Trio who undertake events mailings or Mailchimp who manage our emails. Each organisation would have an agreement with us which sets out the basis on which information is passed to them and limits their ability to use that data to administration only.

We do not as a rule share personal data with any of our commercial partners. We may, for example, allow a commercial partner to run a business card draw at an event and this would be clearly notified to those present that in entering they would be passing their data to a third party.

Data Processing

We do not process your information against databases for the purposes of gaining additional demographic or other information (for example in relation to wealth assessments, or at the database level to identify alternate contact information). If we, or a mailing house, have difficulty with an address we may verify it against anonymous Royal Mail or similar databases to establish that the address we hold it is in a recognisable form, or that a postcode exists.

Although we would not process our databases against third party databases of company or trusts, if we become aware that you are connected to an organisation we have identified as being potentially interested in our work, we may contact you for further information and/or guidance.

Sensitive Personal Data

Should we request information from you which would be classified as sensitive personal data (for example if you have particular dietary requirements, or have issues around access to buildings) then we would seek your express permission to retain that information on our system.