



Bromley House Library Privacy Policy

Last revision date: May 2018

1. Introduction

Bromley House Library is an independent library, a registered charity (1074752) and a company limited by guarantee (03413612).

We need to collect and use certain types of information about employees, volunteers, members and other individuals who come into contact with us. We require this information for legal reasons, for our funders and also to ensure that we can deliver a good quality service to our members and visitors.

We take your privacy seriously and take steps to ensure that your personal information is treated lawfully and correctly. We are registered as a Data Controller with the Information Commissioner's Office (ICO) and are committed to processing data in accordance with our responsibilities under the General Data Protection Regulation (GDPR).

The information below describes how we manage your personal information in accordance with the law and your rights.

2. The information we may hold about you

We may collect and process personal data about you, in paper and/or electronic form, for example:

- Information you give us when you become a member of the Library, including personal details, contact details and Direct Debit information.
- General information you give us when you sign up for events, activities or to volunteer.
- Information relating to recruitment processes and employment.
- Information you give us when you donate or fundraise for us.
- General information relating to any contact you have with us.
- CCTV images of staff, members and visitors.
- Photographs and film taken at events held at the Library.

- Information collected through your use of our website, such as your IP address

We ensure that any personal data that is captured is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

3. What we do with this information

The information we collect may be used in a variety of ways, for example:

- Administration in relation to your membership, including processing Direct Debit payments.
- Communicating with you about news and events at the Library.
- Processing applications for job vacancies, volunteering or research visits
- Bookings for talks, events and other activities run by the Library
- Processing donations that you make to us.
- To seek your views and comments on the services we provide.
- To ensure your safety and security.

4. Our legal basis for processing this information

All data which we process must be done so on a lawful basis: either the basis of consent, contract, legal obligation, vital interests, public task or legitimate interests.

In most cases, we will process your information either on the basis of *legitimate interest* i.e.; in order to continue to deliver our services to you effectively, or in order to fulfil our *contract* with you as a member of the Library.

Where we communicate with you based on your *consent*, for example sending email newsletters to market events or for fundraising purposes, you may revoke your consent at any time.

We will directly ask for your **consent** to process data:

- When you sign up for our e-bulletin on our website
- When you apply for membership of the Library through our application form
- When you apply for a job vacancy, volunteer role or research visit

We will process your data in order to discharge our **contractual duties** with you:

- When you apply for, or renew, membership, in order that we can process your application, request references and receive payment
- When you book tickets for talks and events, so that we can process your booking and any payment required

We will process your data to comply with our **legal obligations** in cases such as:

- Managing employee payroll
- Processing gift-aided donations

We will process your data for our **legitimate interests** as a data controller:

- When we wish to communicate with you about your use of the Library, for example to inform you that books are waiting for you or are overdue, and to send our occasional newsletter through the post.
- To track your borrowing history and to compile general statistics relating to the usage of the Library and our website.

5. How we keep your information safe

We operate accepted standards of technological, physical and operational security in order to protect your personal information from loss, misuse, or unauthorised alteration or destruction.

We will notify you promptly in the event of any breach of your personal data which might expose you to risk.

6. Who we share your information with

We may share your personal information with other third parties who carry out work on our behalf. For example:

- We will share your postal address with our printers, in order that they can send newsletters on our behalf.
- We will share your bank details with a business payments automation company in order to process your Direct Debit payments
- With your consent, we will share your email with MailChimp, in order to send you our regular e-bulletin

Where your information is shared with others, it will be transmitted only through secure means. We disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

We will not share your details with any other organisations for marketing purposes.

7. How long we keep the information for

We will retain your information for no longer than is necessary for the purpose it was collected for. This will vary depending on the type of information and any associated contractual or legal requirements. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid).

If you opt-out from marketing communications then we will keep your information only to ensure we don't inadvertently contact you again.

For historical and future research purposes, we keep a limited amount of information about Library staff and members in archival form after they leave the Library.

8. Your rights

You have the right to:

- See the information we hold about you. Please send your request in writing and we will respond as soon as possible (not longer than one month from receipt). Please note that we will need to see ID before releasing this information to you.
- Ask us to amend or update your information and, in some circumstances, delete the information that we hold on you.
- Ask us not to process your personal information for fundraising or marketing purposes

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF
Tel. 0303 123 1113

For more details about our data processing practices or for any questions, comments or requests please contact the Library Director, Clare Brown.

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