

PRIVACY POLICY

The preservation of your privacy is important to The Constantinian Charitable Trust (“TCCT”) and we are committed to letting you know how we use your personal information and to making only responsible use of your data.

The policy includes the following topics:

1. Your information
2. How we collect your information
3. How we use your information
4. Disclosure of your information to third parties
5. Retention of information
6. Security
7. Cookies
8. Contact details and further information

References to ‘we’, ‘us’, or ‘our’ in this Privacy Policy are references to TCCT, a charitable incorporated organisation (“CIO”) registered in England and Wales with charity number: 1182612.

Our registered address is 31 De Vere Gardens, Kensington, W8 5AR.

We will use the information that we collect about you in accordance with:

- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The EU General Data Protection Regulation (Regulation EU 2016/679), (‘GDPR’) which became effective from 25 May 2018
- any amendments to or replacements of the above legislation, or any additional legislation.

1. YOUR INFORMATION

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, i.e. anonymous data.

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

- **Identity Data** includes first name and last name
- **Contact Data** includes e-mail address, telephone numbers
- **Technical Data** includes internet protocol (IP) address, your 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 our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences. This also includes us making a note of conversations we have had with you in person and/or communications you sent to TCCT. This helps us to manage our relationship with you and ensures you only receive communications from us which are relevant and timely.

2. HOW WE COLLECT YOUR INFORMATION

We collect different information about you in a number of ways:

2.1 Information you give us

When you visit our website or respond to our communications with you, request marketing materials, give us feedback or make a donation, we will store the personal information you give to us such as your name, e-mail address and postal address.

2.2 Automated technologies or interactions

When you visit our website we may automatically collect technical data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies and other similar technologies.

2.3 Information from third parties

We may occasionally receive information about you from third parties as set out below:

- Analytics providers such as Google.
- Where we use them, third party processors such as Eventbrite and MailChimp.
- When we use them, social networks such as Facebook and Twitter.

3. HOW WE USE YOUR INFORMATION

3.1 We will only use your personal information when the law allows us.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform any contract we are about to enter into or have 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 or regulatory obligation.
- Where we have your explicit consent before using your personal information in that specific situation.

When you subscribe to our mailing list, we collect personal information. We use that information in order to tell you about topics of particular interest and to invite you to events we think may be of interest to you. We do not sell or trade e-mail lists with other organisations or businesses. We may, for instance, use a third-party provider to deliver our news and announcements to our mailing list. We gather statistics around e-mail opening and clicks using industry standard technologies to help us monitor and improve our communication with you. You can unsubscribe from our general mailing list at any time by clicking the “Unsubscribe” at the bottom of any of these e-mails or by e-mailing us at secretary@constantinianct.com

3.2 Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely and never excessive. To do this, we use data that we have stored about you, such as which events you have attended in the past, particular areas of interest, and any contact preferences you may have told us about.

3.3 Fundraising communications

TCCT is a registered charity. Under our legitimate organisational interest, we may contact you by post, e-mail or occasionally by telephone, to seek your support for our charitable priorities. This contact will not be excessive and you are able to opt out at any time by using the contact details at the end of this policy or by updating your contact preferences.

3.4 Other processing activities

- We may use profiling to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you.
- You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy.

4. DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our service providers who process data on our behalf and on our instructions.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- We may share anonymous personal information with other organisations, particularly donors, who use this to analyse our audience engagement, event attendance and to understand the impact of TCCT's work.

We do not sell personal details to third parties for any purpose.

We require all third parties to respect the privacy of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

5. RETENTION OF DATA

TCCT will only hold your data for as long as it is necessary for the purposes for which it is being processed. This will be reviewed periodically to ensure the information we do store is accurate, up to date and relevant.

6. SECURITY

6.1 We will take reasonable precautions to prevent the loss, misuse or alteration of information you give us.

6.2 Communication with you may be sent by e-mail. For ease of use and compatibility, communications (other than payments where applicable) will not be sent in an encrypted form unless you require it. Whilst we endeavour to keep our systems and communications protected against viruses and other harmful effects we cannot bear responsibility for all communications being virus-free.

7. COOKIES

7.1 Cookies are text files which may be placed on your computer or device to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. You can if you wish set your browser not to accept cookies.

If cookies are used, they will only be used to assist the purposes set out in this privacy policy, but cookies will not be used if we do not consider them to be necessary.

8. CONTACT DETAILS AND FURTHER INFORMATION

If at any time you would like us to correct or update any information, or if you would like information deleted from our records, please email us at secretary@constantinianct.com

You have the right to request a copy of the information we hold about you. If you would like a copy of some or all of this information, please email secretary@constantinianct.com

This privacy policy may be updated from time to time, so please check it periodically.

Links within our sites to other websites are not covered by this privacy policy.

We are committed to making only responsible use of your data, but please get in touch if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Please also let us know if you have any questions about the information we hold about you, or to change your contact preferences with us:

The Controller for your personal data is The Constantinian Charitable Trust. We can be contacted by e-mail at secretary@constantinianct.com or by post at:-

The Constantinian Charitable Trust
31 De Vere Gardens
London W8 5AR
United Kingdom

Telephone: +44 7879 813136