

## **The Wordsworth Trust**

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## **Background**

The Wordsworth Trust (“the Trust”) is based at Dove Cottage in Grasmere, where Wordsworth lived during his ‘Golden Decade’ (1799–1808) and wrote most of what is now regarded as his most important work. It has been described as ‘the finest literary museum in the world’.

Dove Cottage and the adjacent Wordsworth Museum are now visited by tens of thousands of people a year. As well as operating a busy visitor attraction, the Wordsworth Trust maintains most of the rest of the conservation area of Town End, looks after a unique collection of manuscripts, books and fine art, and runs thriving education, exhibitions, events and community programmes. It is also a centre for international research and scholarship.

## **Definitions**

Some of the terms used are defined below and may be useful when reading this policy.

### *Personal data*

Any information relating to an identified or identifiable natural person (the data subject).

### *Processing*

Holding data counts as ‘data processing’ even if the data is not actively used.

### *Data Controller*

A Data Controller determines how personal data is held and how it is used.

### *Data Processor*

A Data Processor is responsible for processing personal data on behalf of a data controller.

### *Data subject*

The Wordsworth Trust's data subjects include current and former financial supporters, visitors, people who attend our events, our Trustees, employees and volunteers, and the people that we deal with on a commercial basis.

### *Special categories of personal data*

This covers racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, health, and sexual orientation. We do not ordinarily collect or store sensitive personal data, except in the case of our Trustees, employees and volunteers.

## **Our Commitment**

We take our responsibilities seriously in relation to the data that we receive and hold, and we process that data in line with the General Data Protection Regulations (“GDPR”), later the Data Protection Act 2018 (“the Act”).

- We are committed to ensuring that any personal data processed is kept safe and will only be used in connection with the purposes for which it was initially collected.
- We will never sell the personal data we hold.
- We will keep you informed as to why we are collecting your data and what we will be using it for.
- We recognise your right to have access to the data we hold on you.
- We will not collect more data than we need.
- We will not keep the data for longer than is necessary.
- We do not carry out automated individual decision making on your data.
- We will keep your personal data secure.

## **Your rights**

Under the Act you as a data subject have a series of rights which are outlined below

- The right to be informed about how we use, capture and store your data.
- The right of access so you can request a copy of the personal data that we hold about you.
- The right to rectification so you can ask us to correct any data that is inaccurate or incomplete.
- The right to erasure so you can ask us to remove your details from our records.
- The right to restrict processing so you can ask us to stop using your personal data.
- The right to data portability so you can ask to obtain your personal data from us for your own purposes.
- The right to object so you can, for example, ask us to remove you from direct marketing or from processing for historical research purposes.
- The right not to be subject to automated decision making and profiling.

Further information on your rights can be found on the Information Commissioner’s Office website at [www.ico.org.uk](http://www.ico.org.uk).

## **Data Subjects**

Protection of data and data security to a greater or lesser extent affects all areas of the Wordsworth Trust. In the appendices to this policy there are detailed privacy notices in relation to our financial supporters and visitors to our website. We have a separate notice for our employees, which is shared with them and which is available internally. For other areas of data processing please see below how and why we process data and how we endeavour to ensure that it is kept safe. When we receive any personal information from you we will tell you at the time what we will be doing

with your data but rest assured that we will never sell your data, nor will we ever use it for any purpose other than the one for which it was collected. If we are required to share data with our grant funders, we will do so in a way that ensures that individuals cannot be identified. If a grant funder is using public money then the data may be subject to a request under the Freedom of Information Act 2000.

#### *Young people*

We keep to an absolute minimum the amount of data we hold on the young people who engage in our educational activities. If you have visited as part of a school group we will not keep even your name unless you or your group leader has given us consent to do so for a specific purpose such as to use a photograph. We recognise that only children of 13 and over are able to provide their own consent. If you are a Dove Cottage Young Poet we do keep your contact details whilst you are a member of the group (name and email address or telephone number) but will usually communicate with you via the group leader or the closed Facebook page.

#### *Educational group leaders*

If you have visited us as part of an education group or attended a training course and have consented to leave your email address with us so that we can send you information on future events or continuing professional development courses, we will only use your details for these purposes.

#### *Researchers*

As a Researcher, we ask you to complete an application form which contains some of your personal data such as name, address and other contact details along with the reasons for your application. We keep this information as part of our archive on the basis of legitimate charitable interest, but we will not use it for any other purpose. Similarly, we will keep the details of those who have acted as a referee for Researchers.

#### *Visitors*

If you have visited our site and chosen to sign one of our Visitor Books, we will not use this information to contact you, but we will keep the Visitor Book as part of our historical record. The information in the Visitor Book in the Jerwood Centre is used for analysis purposes, and enables us to record how the Jerwood Centre is used. This anonymised data may be shared with our grant funders, but not in a way that would allow individuals to be identified. For details in relation to your use of a debit or credit card or to a gift aid declaration, please see the appropriate section of this notice.

#### *Events attendees*

If you have attended one of our events and booked in advance or paid for your ticket in the shop, we will hold your name, address and contact details. This data in an anonymised form may be shared with our grant funders but not in a way which would allow individuals to be identified. For details in relation to your use of a debit or credit card please see the appropriate section of this notice.

### *Patrons, Friends, Life Friends and other supporters*

We use a combination of consent and legitimate charitable interest to process your data. For more information, please see Appendix One below.

### *Employees*

We use a combination of contract and legitimate charitable interest to process your data. There is a detailed Privacy Notice for employees which has been shared with them.

### *Trustees*

We process your data in a number of ways, including holding your name and contact details, biographical information, date of birth and your skill set. We also hold details of any special requirements you may have such as medical or dietary needs to facilitate your attendance at meetings. A record of attendance at meetings is held and your contributions to meetings may be noted in the minutes. We hold your payment details in our finance system so we can repay any legitimate expenses you incur in your role as a trustee.

It is a legal requirement that we share your information with Companies House and the Charities Commission and there is disclosure of certain of your details within the annual financial statements and annual review as required by regulation.

### *Volunteers*

Our volunteers include those who are involved with the Wordsworth Trust on a regular, short-term or one-off basis, including interns and visiting students. As a volunteer, we will hold your data using our legitimate charitable interest as the basis of processing. We may hold some or all of the following data: your name and contact details, your curriculum vitae and references as well as information on any special requirements you may have including health issues and medical needs. We may hold your payment details in our finance system so we can repay any legitimate expenses you incur in your role as a volunteer. We may log your contribution to the Trust in terms of the hours you have worked and/or the role you have undertaken and we may share this anonymised data about you with our grant funders but in a way which ensures you could not be personally identified unless you have expressly consented to our doing so.

### *Fellows*

We use the title of 'Fellow' to recognise individuals who have made a significant contribution to the Wordsworth Trust, for example as Trustees, longstanding supporters or advocates. If you have agreed to be appointed a Fellow, we hold your name and contact details to enable us to update you with news about the Wordsworth Trust, send you our annual review, newsletters and other updates, and invite you to supporters' events. We process your data under legitimate charitable interest.

### *Suppliers and customers*

If you deal with us on a normal commercial basis as a supplier or customer we will hold some of your personal data on our finance system (Sage 50) if you are trading

with us as an individual. This will include records of payments made to you or received from you. This information may be shared with HM Revenue and Customs, our financial statements auditors Mazars LLP or our tax accountants MHA Moore and Smalley as required, and potentially with our grant funding bodies if the transaction relates to a specifically funded project. We will retain any invoices you send us and records of transactions for the standard period for the retention of financial records, or longer if so required by a funding body, after which time the records will be deleted or destroyed securely.

#### *Others*

Many people are involved in our activities on a one-off or ad hoc basis, such as guest curators, commissioned artists and poets in residence. We will ensure that we only collect from you the information we require to facilitate that particular activity and we will not share that data unless required to by, for example, a grant funder and we will ensure that you are fully aware of any data sharing we do. Depending on the nature of the relationship we have with you we may hold the data under contract or under legitimate interest and we will keep some or all of the data as part of our historical record.

### **Other Data Areas**

#### *Mailing Lists*

We hold a number of mailing lists each of which we use for specific purposes, for example to invite a particular group of supporters to an event or send out a copy of our annual review. On each list we hold only your name and address, or email address if you have opted to receive communications from us by email. You can unsubscribe from these lists at any time. We do not use these lists for any other purposes and we would never share the contents of the mailing lists with other organisations.

#### *CCTV*

There are some CCTV cameras across our premises and boundaries which are there as an important part of keeping our precious collection safe and protecting our staff and visitors. As a visitor to our site, you may be recorded but the footage will only be viewed when necessary and would never be made public unless in the course of a police investigation.

#### *Direct debit collections*

If you support the Wordsworth Trust by direct debit, we keep your bank details securely as part of our financial records as well as embedded within the Barclays Bank commercial on-line banking application we use. These records are only accessible by the staff within our Finance Department, and the only third party who may see these records would be the auditors of our financial statements, currently Mazars LLP. After the standard retention period for financial records, these details will be deleted or destroyed securely.

### *Gift aid*

If you allow us to claim gift aid on your admission ticket we will use the personal data that you provide in order to make the claim. To do this we must share your data with H.M. Revenue & Customs because this is a legal obligation. We will then retain the information for the standard period for financial records after which the details will be deleted or destroyed securely.

### *Marketing*

We may use your data to communicate with you by letter or email for marketing purposes via a mailing list. We will only communicate with you in this way if you have opted in to the mailing and will give you an opportunity to unsubscribe from this mailing list at any time. We sometimes use Mailchimp as a way of facilitating our electronic mailings.

### *Payment security*

If you use a credit or debit card or other electronic payment method to pay for your admission, make a purchase from us, donate to us or make any other form of payment including making payments on line we will pass your card details securely to one of our payment providers – currently Verifone or Stripe. We comply with the payment industry data security standard (PCI-DSS) published by the PCI Security Standards Council and we will never store your card details.

### *Accidents and incidents*

If you are involved in an accident or incident on site, we may have to collect special personal data from you but we will only use the data for that very specific incident and would not store it except in relation to that situation, for example in an accident report or as part of an insurance claim. If we have to retain this data we will take extra care to ensure your privacy is protected

### *Finance system*

We use Sage 50 as our finance system and if you are an employee, volunteer, Trustee, supplier or customer we may hold your bank and other personal details to enable us to pay or invoice you in the ordinary course of our charitable activity.

### *Computer networks*

We use Keswick Computer Solutions to maintain our computer systems and networks and their staff may occasionally need to have temporary access to the contents of our networks for the sole purpose of its maintenance. Within the agreement we have with them they state they will not process personal data for any purposes other than those expressly authorised by us and any processing they do will be in compliance with all applicable laws and regulations. Keswick Computer Solutions operates and is based in the UK.

### **Further information**

If you require any further information on our Privacy Notice please contact the trust by email at [enquiries@wordsworth.org.uk](mailto:enquiries@wordsworth.org.uk) or by post to

### **Data Representative**

The Wordsworth Trust  
Dove Cottage  
Grasmere  
LA22 9SH

### **Complaints**

If we have failed to achieve the standards we have set ourselves in relation to data protection then please send your complaint to our Data Representative at the address above or by email to [enquiries@wordsworth.org.uk](mailto:enquiries@wordsworth.org.uk) and we will deal with it in accordance with our Feedback Policy.

If you are not happy with how we deal with your complaint or you believe your data privacy rights have been infringed then you can complain direct to the UK Information Commissioner's Office using the details below:

Information Commissioner's Office  
Website [www.ico.org.uk](http://www.ico.org.uk)



## **Appendix 1**

### **Financial Supporters**

For the purposes of data protection, we find it helpful to structure our financial supporters into six categories.

1. Patrons, Friends and other regular supporters
2. Occasional supporters
3. One-off supporters
4. Prospective supporters
5. Advocates and ambassadors
6. Life Friends of Dove Cottage

We also recognise that these categories overlap.

Section 1 provides general information that is relevant to all our supporters. Section 2 contains information that is specific to each category of supporter.

### **General information**

1.1 We will hold your personal data on a database, known as a customer relationship management database. We do this to help us build a relationship with you that is tailored and relevant to your interests. The database is provided by CMAC Computer Systems Ltd, whose staff may occasionally need to have temporary access to its contents for the sole purpose of its maintenance. We have a data sharing agreement with CMAC Computer Systems Ltd, and this agreement obliges its staff to delete any data as soon as the project in question is completed. CMAC Computer Systems operates and is based in the UK.

1.2 We use our database for the following purposes:

1.2.1 to store your contact details, so that we can keep in touch with you.

1.2.2 to keep a record of your donations, and where relevant, their purpose.

1.2.3 to keep a record of our correspondence, conversations and other interactions with you, including details of any supporters' events that you attend.

1.2.4 to keep a note of any information that you provide about your intention to remember the Wordsworth Trust in your will.

1.2.5 to keep a note of the names of your immediate family, where these are relevant to our relationship with you. Instances where these might be relevant include when you have taken out a joint or family subscription to the Patrons or Friends of the Wordsworth Trust, when we have your consent to ring you at home, or when we might send you a 'plus-one' invitation to an event.

1.3 We will use your personal data to claim gift aid on your donations when you have told us that they are eligible for tax relief. We will share your data with H.M. Revenue & Customs because this is a legal obligation.

1.4 We will send you information by email if you would like to help us reduce our postage costs or ask us to do so for any other reason. However, unless you have asked to hear from us by email, we will always send you information by post.

1.5 We will not share your personal data with other charities or organisations for direct marketing purposes. You will only hear from the Wordsworth Trust as a consequence of sharing your personal data with us.

1.6 We have never shared our supporters' personal data with third party organisations for profiling, wealth screening or other research purposes, and we will not do this without seeking your permission first.

1.7 If we believe that we have lost touch with you inadvertently, we may use publicly available information to update our records and renew our contact with you. However, we would never do this if we know for certain that you do not wish to hear from us, and we hope that you will let us know if your contact details change.

1.8 We will keep your personal data secure at all times. Access to our database is limited to only those staff who need it, and we require all our staff to observe our data protection 'Golden Rules', including taking a 'clear desk / clear screen' approach to their workspace. We will hold your bank details only for as long as we need it to process your donation, before shredding them.

1.9 You can ask to stop hearing from us at any time, even if you wish to go on giving the Wordsworth Trust your support, by contacting us using the details on page 8.

1.10 Obviously we would be very sorry to hear that you wished to end your relationship with the Wordsworth Trust completely, but should this be the case you can let us know directly or you can look us up on the [Fundraising Preference Service](#).

1.11 We will only keep your personal data for as long as we need it.

1.12 If you are unhappy with the way in which we are using your personal data for fundraising purposes, you can complain to us (see above).

1.13 We are registered with the [Fundraising Regulator](#), who can also consider your complaint if we don't address your concerns to your satisfaction.

## **Specific information**

### *2.1 Patrons, Friends and regular supporters*

2.1.1 We will use your personal data to provide you with the benefits that we promise you at the start of each year of your subscription.

2.1.1.1 As a Friend or regular supporter of the Wordsworth Trust, you will receive

- a membership card and parking permit.
- our newsletter, *The Messenger*, every three months.
- invitations to private views and other events, including the annual Wordsworth Lecture in London.
- information about our public events.
- our e-bulletin if you have asked to receive this information from us by email.
- information about fundraising appeals if you have told us that you are happy to receive them.

2.1.1.2 As a Patron of the Wordsworth Trust, you will receive

- everything that is listed in 2.1.1.1, plus
- invitations to private lunches with the Director and the annual Fellows Reception in London.
- complimentary copies of selected Wordsworth Trust publications.
- other communications that are appropriate to the close relationship that you have with the Wordsworth Trust.

2.1.2 We will keep a record of your date of birth if you have a young person's subscription to the Wordsworth Trust, so that we will know if you are under 26 years old. We will only hold this information for as long as we need it for this purpose.

2.1.3 If you pay your subscription by direct debit or standing order, we will also use your personal data to process transactions and contact you should a problem arise.

2.1.4 Unless you have set up a direct debit or standing order, we will write to invite you to renew your subscription towards the end of each year of your subscription. We will send you a reminder if we don't receive your reply. If we still don't hear from you, we will assume that you do not wish to be contacted further and we will amend our records accordingly. You will still be able to renew your subscription at any time after that.

### *2.2 Occasional supporters*

We are fortunate to have benefactors who support specific initiatives with large gifts at times when their donations will make a significant difference.

2.2.1 We will ensure that you are happy with the way that we communicate with you. We will be delighted to send you news, personal updates and invitations, but only if we know that you would like us to.

### 2.3 *One-off supporters*

2.3.1 We will ask you if you want to hear from us further when we receive your donation, and we will check that we understand your preferences fully.

2.3.1 The Charity Commission expects us to do due diligence regarding any large one-off donations that we receive, especially if the supporter is previously unknown to us. We may therefore carry out research using public sources of information to help us meet this legal obligation. If this is the case, we will let you know at the time.

### 2.4 *Prospective supporters*

2.4.1 If we consider it in our legitimate interest to do so, we may contact individuals who are not already aware of us but who might be interested in our work. However, first we will carefully consider the impact of our approach, and satisfy ourselves that it won't be out of balance with their fundamental interests or rights and freedoms.

2.4.2 We recognise that many philanthropists expect to have been researched by the charities that approach them, and we may also use information that is in the public domain to find out about more about them before we get in touch with them.

2.4.3 At the first point of contact, we will explain our reasons for getting in touch with a prospective supporter and the nature of any research that we have done, and we will only maintain contact with them if they tell us that they are happy for us to do so.

2.4.4 We will endeavour to contact prospective supporters within one month of doing any research on them.

2.4.5 We will not add prospective supporters to our database unless and until they confirm that they wish to support the Wordsworth Trust.

### 2.5 *Ambassadors and advocates*

We are grateful to our network of people who help us to promote the Wordsworth Trust's aims and values, to funders, decision-makers and other people of influence.

2.5.1 We will send you news, personal updates and invitations where it is in our legitimate interest to do so, and you can ask us to stop communicating with you, or change the way in which we communicate with you, at any time.

### 2.6 *Life Friends of Dove Cottage*

The Wordsworth Trust offered supporters the status of 'Life Friend' before the scheme was closed and replaced with the Friends of the Wordsworth Trust in 2003.

2.6.1 We will send you one copy of our quarterly newsletter *The Messenger* a year (usually in December) for as long as you would like us to do so. We will have sent you a letter in April 2018, asking you to confirm that you would like to go on hearing

from us. If you do not remember receiving or replying to this letter and you would like to stay on our mailing list, please contact us to let us know.

2.6.2 We will also send you information about our public events if you have asked us or wish us to do so.

## **Appendix 2**

### **Cookies**

Our website, [www.wordsworth.org.uk](http://www.wordsworth.org.uk) uses two types of cookies:

#### **Site performance cookies**

##### **Anonymous analytics cookies**

However, you may receive other third party cookies, by interacting with parts of the site which share functionality with third parties. For example, Facebook, Twitter, YouTube and other social media networks.

#### **Site performance cookies**

This type of cookie remembers your preferences, so you don't have to re-set them each time you visit. Examples include:

- Configuration of tools, including third party (e.g. Volume settings on YouTube Videos)
- Your search criteria when searching/browsing the site

#### **Anonymous analytics cookies**

Every time a user visits our website, web analytics software provided by a third party generates an anonymous analytics cookie.

These cookies can tell us whether or not you have visited the site before. Your browser will tell us if you have these cookies, and if you don't, we generate new ones. This allows us to track how many individual unique users we have, and how often they visit the site.

These cookies cannot be used to identify individuals; they are used for statistical purposes only.

#### **Other third party cookies**

On some pages, third parties may also set their own anonymous cookies, for the purposes of tracking the success of their application, or customising the application for you. Because of how cookies work, we cannot access these cookies, nor can the third parties access the data in cookies used by this website.

For example, when you share an article using a social media sharing button, the social network that has created the button will record that you have done this.

#### **How do I turn cookies off?**

It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies from a particular website.

All modern browsers allow you to change your cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser. You can use the 'Help' option in your browser for more details.