

## **Newbold Verdon Heritage & Archive - GDPR (General Data Protection Regulation) Privacy Notice**

Newbold Verdon Heritage & Archive will be what is known as the 'Controller' of the personal data provided to us.

For administrative and operational purposes, we only collect basic personal data about you. This includes name, address, email, phone number.

We may collect more complex data, where it is fundamental to the items and collections contained in our local history archive, or the metadata contextualising such items.

### **Why we need your data**

We will not collect any personal data from you we do not need in order to provide and oversee our local history archive services, in the public interest.

We need your basic personal data for one of the following reasons:

- Administrative / operational data collected as part of the process of running a small, community-based organisation. This would mainly be current and past Newbold Verdon Heritage & Archive committee members (as the group operates an ad hoc group, attendance at one or more meetings and / or participation in the organisation of the group's activities is considered to constitute 'membership'), for example: the names, addresses, telephone numbers and email addresses of members.
- As part of the Newbold Verdon Heritage & Archive local history archive itself; for example: names, addresses, occupations and events contained within letters, documents or photographs relating to living people.
- As the registered users of an archiving software platform; for example: names and email addresses are stored.
- Stakeholders and partners - people who donate items to Newbold Verdon Heritage & Archive; for example: names and email addresses.

### **What we do with your data**

All the personal data we process is managed by our Committee. However, for the purposes of computer-based hosting and backing-up this information may be located online.

Where this is the case, Newbold Verdon Heritage & Archive will endeavour to ensure that, where possible, all companies involved in hosting your data are compliant with GDPR.

Newbold Verdon Heritage & Archive will always try to ensure that no third parties have access to your personal data, unless the law allows them to do so.

### **How long we keep your data**

Personal data that we hold for administrative / operational reasons will only be retained while current and then for a further, reasonable period of time. Newbold Verdon Heritage & Archive will periodically review data of this nature and (if its continued relevance is in doubt) we will contact you to ask if you still wish to hear from us. If no answer is received, we will erase your data.

If your personal data is in our local history archive, it will be retained indefinitely. This is on the basis of public interest - as permitted under exemptions for archives in the UK Data Protection Act 2018.

### **What we would also like to do with your data**

Where we have your name and email address for administrative / operational reasons (you are or have been a member, or you have donated to Newbold Verdon Heritage & Archive, collaborated with us in the past), we would like to stay in touch to inform you about our future activities and events.

This information is not shared with third parties and you can unsubscribe at any time by emailing [nvparchive@gmail.com](mailto:nvparchive@gmail.com)

Personal data associated with items in our local history archive will be retained on the basis of public interest.

### **UK law exemption from specific GDPR articles for the activity of ‘archiving in the public interest’**

As the keeper of a local history archive, Newbold Verdon Heritage & Archive is exempt from specific GDPR articles, as detailed in:

Data Protection Act 2018 (2018 c.12) - SCHEDULE 2 (Exemptions etc from the GDPR), paragraph 28, which states:

“The listed GDPR provisions do not apply to personal data processed for archiving purposes in the public interest to the extent that the application of those provisions would prevent or seriously impair the achievement of those purposes”.

The list of exempted GDPR articles (specifically relating to public archives are): 15 (1-3),16,18,19,20,21. For an explanation of these articles, see: Rights of the data subject - <https://gdpr-info.eu/chapter-3/>

These exemptions mean that some of your rights under GDPR will have a more limited application, than for your information held by other data controllers (banks, utilities companies, social media companies etc.).

### **What are your rights**

If at any point you believe that the administrative and operational personal data about you is incorrect, you can request to see this information and have it corrected or deleted (our responsibilities for correcting your archive-based personal data differ from this - see below).

Please note: under the UK Data Protection Act 2018’s archive exemptions, Newbold Verdon Heritage & Archive is not obliged to correct archival records, but we will always respond to such requests in a sympathetic manner, explaining our decision to you and adding detailed notes about the request to any metadata relating to the contested archive item.

You may request the erasure of your personal data held in our history archive, but we are generally only required to comply, where it is no longer necessary for us to retain it. As our need to retain your data indefinitely is essential to the purposes of maintaining a history archive (and is in the public interest), it is unlikely that we will agree to erasure.

However, we may consider withdrawing public access to it, at least on a temporary basis, to allow further discussion. Requests concerning archive data relating to you, would need to be made in writing.

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated by emailing [nvparchive@gmail.com](mailto:nvparchive@gmail.com)

If you are not satisfied with our response, or you believe that we are processing your personal data not in accordance with the law you can complain to the Information Commissioner’s Office <https://ico.org.uk/>

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