

The Walpole Society: Register of Systems for GDPR
Approved by the Committee, 26th March 2024

Introduction

The Walpole Society is a charity registered in England and Wales (no. 270280, see Charity Commission website [here](#)) which must comply with GDPR whose principles are set out in our Data Protection Policy (2023).

Our Data Protection Policy requires us to maintain and review annually a Register of Systems that sets out how and why we use your personal data. The Register is intended to help ensure that you remain informed and in control of your information. In this document, ‘you’ and ‘your’ means the individual to whom the information relates, and ‘we’, ‘us’ and ‘our’ means the principal officers of the Walpole Society - the Chairman, Treasurer and Secretary - and the consultants who undertake specific tasks on their behalf, namely as book-keeper (in March 2024 Ola Tomori) and Executive Administrator (in March 2024 Claire Ó Nualláin). These individuals act on behalf of the Trustees of the charity.

What is ‘Personal Data’?

It is information that identifies a living person, or which can be identified as relating to a living person. *We collect different data dependent upon the reason that you are in touch with us.*

What is our ‘Lawful Basis’?

The GDPR requires organisations that hold and use personal data to follow the principles set out in our Data Protection Policy, paragraph 1. There must be a clear lawful basis for our use of your data. In general, the lawful basis we rely on is ‘Legitimate Interests’ - in other words, you disclose certain information about yourself to us in the expectation that we will use it to operate our membership scheme and deliver our charitable objects, and that is how we use it. This document sets out in more detail what actually happens - what information we collect and hold, how we use it and (in some cases) with whom we share it, and what the lawful basis is.

Using personal data in our membership scheme

The WS’s charitable activities are funded by a membership scheme for personal and corporate members in the UK and worldwide.

Lawful basis for processing: legitimate interest

<i>Data we collect</i>	<i>How we hold & use your data</i>	<i>With whom do we share your data?</i>
You give us contact details (title, name, address, e-mail, telephone)	We hold this securely in a password-protected membership database, in order to deliver your membership	We send our printer, Henry Ling, your name & address so they can print address labels for our Annual Volume. Then Royal Mail deliver to you.
You give us financial details (bank account, direct debit authorisations, debit/credit card info)	We use this information to process your membership payment	Systems for accepting payments. TBC <ul style="list-style-type: none"> ● <i>GO CARDLESS</i> ● <i>[other payment processor eg via Wix]</i>
You may make a Gift Aid declaration	We keep a record of all Gift Aid declarations so we can claim back tax on your membership.	We share information about your payment with HMRC
When joining, you select a Membership category	We hold this information to deliver the correct membership subscription.	n/a
You tell us if you want to opt into or out of contact by post or email	We record your contact preferences on our membership database to ensure that our contact with you is appropriate	n/a
Data about you is generated in the course of membership (eg year of joining, past donations, if you are ex-Trustee) and from engagement with us (eg you	We record pertinent information on our membership database in order to have a more informed relationship with you (eg so that we are not ignorant of something important	n/a

write to us about your art historical interests)	about you that you have told us or would expect us to know)	
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Using personal data when organising events

We may hold events for members and non-members.

Lawful bases for processing: contract, consent

<i>Data we collect</i>	<i>How we hold & use your data</i>	<i>With whom do we share your data?</i>
You give us contact details (title, name, address, e-mail, telephone) when you reply to an event invitation	Knowing who is coming helps us to organise it (eg ensure we have a venue of the right size & facilities) We can notify you of any late changes.	3rd party ticketing service such as Eventbrite If the owners of the venue require it, we may share your name with them (eg if they are in charge of admitting people)
You give us financial details (debit/credit card info) when paying for a ticket	We use this to take payment for the event so we can afford to organise it	3rd party ticketing service such as Eventbrite 3rd party payment processing service
Your contact info and the fact of your attendance at past events	to know how many people attended an event, which helps us to plan future ones and invite you to relevant events.	n/a

3. Using personal data when sharing news about our charity

We may send newsletters and press releases to art world contacts and our members containing information about the Society's activities and other relevant news. All such emails will contain an opt-out option so that you remain in control.

Lawful bases for processing: consent

<i>Data we collect</i>	<i>How we hold & use your data</i>	<i>With whom do we share your data?</i>
Personal details and contact preferences of members	This is held as indicated above, on the membership database	n/a
Personal details (name, email, job title) of non-members	These are recorded on a password-protected spreadsheet.	n/a
Contact preferences of non-members	Where non-members opt out of email contact their address is deleted from the spreadsheet.	n/a

4. Using personal data on our website

Cookies are small pieces of data that are stored on a user's computer when they visit a website. Some cookies help websites remember information about the user, such as their language preference, login status, and preferred font size. Others serve the website owner's interests by generating data about website usage and performance. Some cookies also facilitate advertisers' businesses, by helping to target messages to users based on their browsing history. Some users may choose to disable cookies in their browser settings to prevent this kind of tracking. For more information on how to manage cookie settings, visit the following websites:

- For Microsoft Internet Explorer: <http://support.microsoft.com/kb/196955>
- For Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- For Mozilla Firefox:
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- For Apple Safari: https://support.apple.com/kb/PH19214?viewlocale=en_US&locale=en_US

Our website is designed and hosted (RS to confirm) using Wix and cookies may be used

Third Party Links

The Walpole Society website may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

How long will we keep your data?

We will retain your personal information only for as long as is necessary to fulfil the purpose(s) for which we collected it and as required by relevant legal requirements in the UK, eg. by HMRC for Gift Aid.

We review what information we hold and will delete membership data after a period of five years after your membership has lapsed.

Our Data Controller and Data Processor

Although the Walpole Society is not required to register with the Information Commissioner as a controller that engages in processing personal information of data subjects (confirmed via the self-assessment tool on the ICO website), we are required to identify the Data Controller and the Data Processor, who are primarily responsible for ensuring good management and security of personal data. The Data Controller is responsible for determining the need for and means of processing personal data (in any format), and the Data Processor processes (i.e. uses) the data on behalf of the Data Controller. In the Walpole Society, the Chairperson (in 2024 Clare Hornsby) and Treasurer (in 2024 Lawrence Hendra) are jointly the Data Controller, and the Editor and Secretary (in 2024 Richard Stephens) are jointly the Data Processor.

Your rights

We want you to remain in control of your personal data and to understand your legal rights:

- the right to be informed about the collection & use of your personal data
- the right to access your personal data
- the right to have inaccurate personal data that we hold on you corrected, or completed if it is incomplete
- the right to have your personal data erased (unless the processing is necessary, for example to comply with a legal obligation, for archiving purposes in the public interest, scientific research, historical research or statistical purposes)
- the right to restrict processing
- the right to data portability
- the right to object

We will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies).

When we get things wrong

Should you have a complaint or feel we've made a mistake, do please let us know. Our Chairwoman, Dr Clare Hornsby, or Treasurer, Lawrence Hendra, would be happy to hear from you chairwoman@walpolesociety.org.uk or treasurer@walpolesociety.org.uk or by post to 84 Cambridge Street, London SW1V 4QQ. Alternatively, you may complain directly to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (or via <https://ico.org.uk/make-a-complaint/>)

Keeping this Register up to date

We will review this Register of Systems annually to ensure it remains up to date with the rules and continues to reflect how and why we use your personal data. The current version will always be posted on our website.

This Policy was approved by the WS Committee on 26th March 2024 and will be reviewed in March 2025.