



**EFFECTIVE 20 MAY 2018**

At Grad, we are committed to upholding your privacy and safeguarding the personal data you share with us.

Under the Data Protection Law in the United Kingdom [(including, but not limited to the EU General Data Protection Legislation and UK data protection laws and regulations) 'Data Protection Law'], we are required to provide certain details regarding Grad's collection, use and protection of your personal data. Further information is outlined below.

We may modify or update this Privacy Policy in order to reflect changes to our privacy practices, or for other operational, legal or regulatory reasons. If we make changes to this Privacy Policy, we will notify you of such changes by posting the revised policy on this website, or by other means of communication where appropriate.

If you have any queries about this website and how Grad uses your personal data after reading this Privacy Policy, please contact: [info@grad-london.com](mailto:info@grad-london.com)

### **Your Data Rights**

Data Protection Law gives you certain legal rights in relation to how Grad records and uses your personal data.

If at any point you believe the personal data we hold on you is incorrect, you can request to see this information, and have it corrected or deleted (where necessary) by contacting us at [info@grad-london.com](mailto:info@grad-london.com).

### **A summary of your rights under Data Protection Law is as follows:**

1. The right to access the personal data we hold on you and other information about how we use it, who we share it with, where we obtain it and how long we keep it for. We will usually have one month to respond, except for complex requests where this may be extended by a further two months and we may charge a fee for dealing with any manifestly unreasonable or excessive requests.
2. The right to request that we correct and update any inaccurate or out of date personal data we hold on you.
3. The right to data portability where your personal data was collected with your consent or under contract and our processing of that personal data is automated.
4. The right to withdraw your consent to the processing of your personal data at any time, where such processing is subject to your consent.
5. The right to object to the processing of your personal data or to request that we erase your personal data, where we no longer have a legitimate reason for processing such data or it is being processed unlawfully.
6. The right to lodge a complaint with the UK data protection regulator or the Information Commissioners Office (ICO) if you think that we are breaching your rights under Data Protection Law.

If you wish to exercise any of your rights above or raise a complaint around how we have handled your personal data, you can contact [info@grad-london.com](mailto:info@grad-london.com) and request for our Director to investigate the matter.

We may ask for more information from you to verify your identity or clarify the nature of your request before we can respond in full.

If you are not satisfied with our response and you believe we are not processing your personal data in accordance with the law, you can contact the Information Commissioner's Office (ICO) by telephoning +44 (0)303 123 1113, sending post to the Information Commissioner's Office, Wycliffe



House, Water Lane, Wilmslow, Cheshire SK9 5AF, or visiting their website at: <https://ico.org.uk/concerns>

### **Our Data Collection**

We need to collect, hold and use personal data in order to provide goods, services and marketing information as well as other purposes in connection with the operation and administration of Grad, including:

- Managing the purchasing of merchandise and tickets
- Sharing details of our programme with you when you sign up to our newsletters or if you are a press contact
- Membership administration
- Agreeing to join our Board or present a talk or event at Grad
- Applying for a vacancy at Grad
- Providing services as a contractor or third party employee
- Other purposes we inform you about and that you occasionally agree to

We will not collect or store any personal data that we do not need or is not required for legal or other legitimate purposes. Marketing emails and other electronic communications will only be sent to individuals at their email address where we have their consent or the information relates to products/ services they previously purchased from Grad. All electronic marketing communication from us will have an unsubscribe option, so you can let us know immediately if you do not want to hear from us.

### **Use of Data**

All the personal data we hold about you will be processed by our staff or authorised contractors only in connection with the above. Your personal data may be stored or processed via third party suppliers who only process personal data acting in accordance with our instructions. These suppliers help us with: emailing newsletters and invitations services to facilitate online purchases (Mailchimp), ticketing payments and membership (PayPal) or running surveys that you may choose to participate in (Survey Monkey).

We take all reasonable steps to ensure that your personal data is processed and stored securely in accordance with the Data Protection Law. We also have internal guidelines in place to make sure that Grad staff respect your privacy and only use your personal data for lawful, legitimate purposes.

### **WHAT WE COLLECT AND HOW LONG WE KEEP IT**

Grad collects personal data in relation to the following areas:

#### **Online Purchases**

When you make an online purchase, we collect your personal data in order to process your purchase, deliver the purchased item to you and provide any required after-sales services.

Your online purchases for tickets and membership are processed through a third party payment processor, PayPal, and the personal data you submit is stored in our database. This information is only accessible to our Communications Team. We keep this information to allow for after-sales customer service and to notify customers about vital information or changes to the range or programme. Personal data is retained for a maximum of six years since your last booking or purchase.

Grad does not store any credit or debit card details.



### **Newsletters and Invitations**

You can sign up to receive our newsletters through our general newsletter sign-up or at the point of an online purchase and/or on our website [www.grad-london.com](http://www.grad-london.com). All electronic marketing communication from us will have an unsubscribe option so you can let us know immediately if you do not want to hear from us.

The general newsletter sign-up is via a Mailchimp, so your data automatically uploads to our mailing lists. For newsletters and invitations, your personal data is only accessible by the Communications Manager.

### **Press**

Members of the press, who we have been in touch with previously, may receive information from Grad on forthcoming programme and invitations to events as sent out by the Communications Manager. You can unsubscribe from these emails at any time using the unsubscribe link at the bottom of each email. You can sign up to receive emails from us via our general newsletter sign-up or by emailing [info@grad-london.com](mailto:info@grad-london.com)

### **Surveys**

We might occasionally post the link to a survey form on our website, in our newsletter or on our social media. These surveys might be needed to help us better understand our reach and visitors. These surveys will be anonymous and the personal data we request will be limited to the basic information we need for the survey. Only the Communications Team have access to this data.

### **Personal data of suppliers, contractors and their employees**

We may need to collect personal data from suppliers, freelance contractors or their employees to allow for the delivery of a service to Grad. This data will only be accessed by the staff member working with you. Contract paperwork will be stored for the duration of the contract and for six years after the contract has lapsed to deal with contract queries or legal claims. Personal data stored outside the framework of the contract or any related paperwork will be deleted after our work together comes to an end.

### **Cookies**

A 'cookie' is a tiny element of data that a website can send to a visitor's computer's browser (e.g. MS Internet Explorer or Google Chrome), so that their computer (or electronic device used to access the website) will be recognised by the Grad website on their return. Cookies also allow our web server to recognise a computer on connection to the Grad website, which in turn allows our server to make downloading of website pages faster than on first viewing. In addition, cookies may also be used by us to establish statistics about the use of the Grad website by Internet users by gathering and analysing data such as most visited pages, time spent by users on each page and website performance etc.

We collect and use such cookie data to enable us to develop and enhance the experience of visitors to the Grad website. Cookies do not identify you personally, but the computer or device used to access our website.

The data collected by our servers and/or through cookies that may be placed on your computer or device will not be kept for longer than is necessary to fulfil the purposes mentioned in this Policy. Unless stated in this Policy, cookies on the Grad website are usually only active for the duration of your visit and are not stored on your computer once you have closed your web browser.

You can set your browser to block the recording of cookies on your computer or device to minimise the amount of data that may be collected about your visit. Your browser can also be set to notify you when a cookie is being recorded. However, if you block cookies then you may not be able to use all the features or services on our website.

We may also automatically collect information about each page you visit, including your domain, IP address, the previous site accessed and the browser you use and your operating system. This information is used for the purpose of monitoring and improving use of our website and is not used to identify you in any way.



Information generated by the use of cookies may be compiled by Grad, but this will only be in an aggregate form so that no individual can be identified personally.

### **Google Analytics**

Grad website also uses Google Analytics, a web analytics service provided by Google, Inc., which uses cookies to help us analyse how the Grad website is used. The information generated by the cookie about your use of the website (including your IP address at the time of logging on), will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and Internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. For more information, see 'How Google uses data when you use our partners' sites or apps'.

You may refuse the use of these cookies by selecting the appropriate settings on your browser.

Grad uses this data to understand who our users are as an anonymised mass and how they are using our site. We do not have the ability to identify our website users by their IP address.

### **Social Media**

All the social media platforms we use provide anonymised data on the users of our pages or accounts for the purposes of analysis and reporting. We do not store identifying user data from any of the users of our social media platforms. We abide by the Terms and Conditions of each individual social media platform.

### **Filming and photography**

Sometimes filming, photography and audio recording is in use at Grad, particularly during events and the recordings may be posted on our website or released by Grad for promotional purposes. When this is the case, it is made clear by signage advising visitors to speak to Grad staff for further information if needed.

## **THE LAWFUL GROUNDS ON WHICH WE COLLECT AND PROCESS PERSONAL DATA**

Grad processes your personal data for the above purposes relying on one or more of the following lawful grounds under Data Protection Law:

- Contract: where we provide services, in order to set up and perform our contractual obligations to individuals
- Consent: where you have freely provided your specific, informed and unambiguous consent for us to process your personal data for particular purposes
- Legitimate Interests: in connection with Grad's legitimate interests of being able to effectively administer and promote the work of Grad, run events, operate our Membership and Friends' programmes, run our webshop and manage our services in a safe and efficient manner. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and, in particular, your right to privacy; and/or
- Legal Obligations: where we need to process personal data to comply with a legal obligation or for the purpose of us being able to establish, exercise or defend legal claims



### **Data Sharing**

We do not share, sell or rent your personal data to third parties for marketing purposes. However, we may need to share your personal data with third parties in the following circumstances:

- When using suppliers or service providers to support our operations as described in this Privacy Policy. We require these third parties to act lawfully in accordance with our instructions and ensure that appropriate controls are in place to keep your information secure.
- Where we are under a duty to disclose your personal information in order to comply with a legal obligation (for example to law enforcement agencies), or in order to enforce or apply our rights (including enforcing applicable terms and conditions) for where needed to protect ourselves against criminal or illegal activity – for example, to conduct fraud checks.

#### Data transfers outside Europe

For financial and technical reasons, Grad may, on occasion use the data hosting or data processing services of a supplier who is based outside the UK and European Economic Area (EEA), which means that your personal information may be transferred to that supplier and processed and stored outside the UK and EEA.

This includes countries, such as the United States, that are not currently considered to have the same standards for legal protection of personal data that you enjoy in the UK.

However, we will always take steps to choose highly reputable suppliers, who respect your security and Grad will put suitable legal safeguards in place with that supplier to protect your personal data, so that it is subject to the same standards of privacy that you have in the UK.

**For further information about the above, please email: [info@grad-london.com](mailto:info@grad-london.com)**