



## Privacy Policy

**Name of museum** - Northern Ireland War Memorial (NIWM)

**Name of governing body** - The Council of the Northern Ireland War Memorial

Incorporated

**Date on which this policy was approved by governing body** – 7<sup>th</sup> June 2018

**Date at which this policy is due for review** – June 2019 or as required

### 1. Introduction

The NIWM is committed to protecting your privacy and security. This *Privacy Policy* explains how and why we use personal data and is intended to help ensure that data subjects remain informed and in control of their information.

This policy has been written to outline how the NIWM collects, stores and processes data in line with the General Data Protection Regulation (GDPR).

This policy is reviewed annually or as required and is available to read online at [www.niwarmemorial.org](http://www.niwarmemorial.org) where updates are also published.

### 2. About the NIWM

The Northern Ireland War Memorial is an accredited museum situated in the heart of the Cathedral Quarter. The museum tells the story of Northern Ireland's role in the Second World War focusing on the story of the Belfast Blitz in 1941, the Ulster Home Guard, the role played by women in the war and the presence of US Forces from 1941 to 1944.

The Council of the Northern Ireland War Memorial (Incorporated) is a registered charity in Northern Ireland (NIC 103635) and registered as a company limited by guarantee (NI 002888).

### 3. GDPR definitions

Data: information which is being processed or recorded.

Personal data: any information relating to an identified or identifiable natural person (identifiers include name, identification number, genetic identity etc.)

Data subject: a living individual to whom personal data relates.

Data Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Controller: the organisation which determines the purposes and means of the processing of personal data.

Data Processor: any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

### 4. The NIWM's commitment to data protection

As a controller of data, the NIWM is aware of and is compliant with the 6 data protection principles under GDPR.

The NIWM collects, stores and processes data:

- In a fair, lawful and transparent way
- For specified, explicit and legitimate purposes ('purpose limitation')
- Adequately and relevant and limited to what is necessary ('data minimisation')
- Accurately ( keeping data up to date)
- No longer than necessary
- With integrity and confidentiality by taking security measures against unlawful processing, damage or destruction

The NIWM collects, stores and processes data on the following grounds:

- Necessary for the performance of a contract
- Legal obligation
- Legitimate interests

The NIWM has made its suppliers who act as Data Processors aware of the changes to the Data Processing Schedule. The NIWM has specific Data Protection agreements in place with its Data Processors where necessary.

**5. What data does the NIWM collect, store and process?**

<b>Data subject</b>	<b>Types of data</b>	<b>Grounds for processing</b>	<b>Purpose of processing</b>	<b>Retention period and criteria</b>
Trustees and Council Members	Name, address, date of birth, email address and subscription preferences	Legal obligation  Legitimate interests  Consent	Legitimate business	For as long as we have business with them, with regular requests to update data and subscription preferences
Staff	Name, address, date of birth, email address, bank details	Necessary for the performance of a contract  Legal obligation  Consent	Legitimate business	1 year from termination of contract with option to opt in to general mailing list
Contractors and suppliers	Name, address, email address and bank details	Necessary for the performance of a contract  Consent	Legitimate business	For as long as we have business with them
People who wish to join our public mailing list about NIWM events and projects	Name, address, email address and subscription preferences	Legitimate interests  Consent	Marketing	5 years with opt out available at any time
People who donate objects/stories to the NIWM collection	Name, address, email address	Legal obligation  Consent	To prove the transfer of title to the NIWM	Indefinitely
People who make enquires, comments or provide feedback about the museum on our website, through email and by post	Name, address, email address and comment/query	Legitimate interests  Consent	To improve our service  Strategic planning	5 years

People who use our website	Internet Protocol (IP) address and information on how they use our website	Legitimate interests  Consent	To improve our service  Strategic planning	5 years
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\*A full Data Mapping exercise has been completed (May 2018). This document is stored securely at the NIWM and is updated as required.

## 6. Information for website users and public mailing list subscribers

When visiting the NIWM website or joining our mailing list, you are sharing information with the Northern Ireland War Memorial alone. Your information will not be shared with any other organisations or third parties unless we have your permission or are required by law to do so.

Data shared with the NIWM is safely and securely stored on our secure server and internal network.

Only authorised staff have access to our secure server and internal network.

NIWM collect personal information in order to understand your needs and to provide you with the service you expect to receive.

The main reasons we collect data:

- Internal records and statistics (visitor figures and feedback etc.)
- To contact you with updates or upcoming events that may be of interest
- To gather feedback which informs our strategic plan
- To send email alerts to users who have requested them
- To improve our service and our website according to your preferences
- To provide information on local services or organisations that may be of interest to you\*

\*On our website or with any personal correspondence we may have with you, we may suggest other organisations that may benefit you. We take no responsibility for those individual organisation's personal views, or the accuracy of information contained within their services. Do also note that these other organisations/ websites will have their own privacy policies. You should be cautious before you enter any personal details into their websites.

If you have subscribed to our mailing list, we will regularly contact you with updates on NIWM activities by email. Each of these emails will present you with an opportunity to make changes to the personal information we have stored about which ensures your data is kept up to date and in line with GDPR regulations. The data of mailing list subscribers will be

stored securely for 5 years. After that time data subjects will be asked to re-subscribe if they wish to continue to receive mailings from NIWM.

You can opt out of receiving any correspondence by clicking unsubscribe in any of our emails or by writing to us at:

Northern Ireland War Memorial  
21 Talbot Street  
Belfast  
BT1 2LD

## 7. Access to Information

You have the right to access the information held about you at any time. You can view, update, or delete any information by contacting us. Please contact the address above for this information.

## 8. Safeguarding Children and Vulnerable Adults

This *Privacy Policy* should be read in conjunction with our *Safeguarding Children and Vulnerable Adults Policy*.

When we photograph our events, a photography notice will be displayed explaining that photographs taken will be used solely for the activities of the NIWM and may appear in our promotional material, whether in printed or electronic form (website, social media, film). The notice will also explain that on occasions we may release the photographs to the media and that every effort will be made to ensure the photograph is not used outside of the context in which it was taken.

We will ask people who appear in photographs to complete a photography permission form. Parents/guardians of individuals under the age of 18 will be required to sign and complete a photography permission form.

In doing so we may collect some data about the photograph subjects (e.g. name, school name, age). NIWM respects the privacy of children and adults who take part in our education programmes. We will store photographs and data securely in our image library for no longer than five years, and your consent will automatically expire after this period. At this stage your data will be deleted, however the photograph(s) will be stored and retained in our archive indefinitely.

### Questions:

If you have any questions regarding this Privacy Policy you can contact us by emailing: [info@niwarmemorial.org](mailto:info@niwarmemorial.org) or in writing to the address below.

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