

THE ROYAL WARRANT HOLDERS ASSOCIATION

PRIVACY POLICY

The Royal Warrant Holders Association (RWHA) and the RWHA Charity Fund are committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection the Data Controller is the RWHA.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers the RWHA and its subsidiary, the RWHA Charity Fund, in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information.

If you have any questions about this Policy or concerning your personal information please contact the CEO & Secretary RWHA at warrants@rwha.co.uk or by post to The RWHA, 1 Buckingham Place, London SW1E 6HR.

Type of personal information we collect

The type and amount of information we collect depends on why you are providing it.

The information we collect when you apply for a new Royal Warrant or a change to an existing Royal Warrant and when it is reviewed can include your name, date of birth, company email address, postal address and phone number. A new Royal Warrant application or an application to change a grantee also requires that a short biography of the new grantee is also submitted.

If you are an addressee, registered on our database as a contact or you are applying for tickets to an RWHA event your name and company contact details (your full address, email address and your phone number) will be recorded.

All credit card transactions are managed through PayPal and therefore the RWHA does not hold any personal financial data. Any personal cheques are processed through the bank in the normal way.

If you are applying for a job the information you are asked to provide is as set out in the application and is necessary for the purposes of our considering the application.

How we collect information

We might possibly collect information from you whenever you contact us or have any involvement with us for example when you:

- Apply for a Royal Warrant and when it is reviewed or changed
- Visit our website
- Participate in any of the business, social or sporting events
- Enquire about applying for the Royal Warrant
- Sign up as a member to receive news about our activities
- Create or update a profile
- Post content onto our website/social media sites
- Sponsor an event or activity
- Attend a meeting with us and provide us with information
- Contact us in any way including online, email, phone, SMS, social media or post

Where we collect information from

We collect information:

- (1) From you when you give it to us directly: You may provide your details when you ask us for information or enquire about applying for a Royal Warrant
- (2) When you use our website: When you use our website information about you is recorded and stored. See the information about the use of cookies under that heading below.

How we use your information

We will use your personal information in several ways which reflect the legal basis which applies to the processing of your data. These may include:

- Processing and managing information pertinent to the Royal Warrant
- Providing you with the information or services you have asked for
- Processing your subscriptions
- Organising any activity which you have told us you want to be involved in and in relation to any fundraising for the Charity Fund which you are involved in.
- Sending you communications with your consent that might be of interest including information about our services, activities, campaigns and appeals asking for donations and other fundraising activities for the Charity Fund for which we seek support
- When necessary for carrying out your obligations under any contract between us

- Seeking your views on the services or activities we carry out so that we can make improvements
- Maintaining our organisational records and ensuring we know how you prefer to be contacted
- Analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness
- Processing job applications

Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at warrants@rwha.co.uk This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- Where it is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract.
- Where it is necessary to comply with our obligations to manage the Royal Warrant and where necessary to share this information with the Lord Chamberlain's Office.
- Where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.

If you want to contact us about your marketing preferences please contact warrants@rwha.co.uk or call on 020 7828 2268

How we keep your information safe

We understand the importance of security of your personal information and take appropriate steps to safeguard it through regular security reviews of our own systems and of our data processors.

We always ensure only authorised persons have access to your information, which means only our staff and contractors, and that everyone who has access is appropriately trained to manage your information.

No data transmission over the internet can however be guaranteed to be 100% secure. So while we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

Who has access to your information?

The following third parties will have access to information:

- Third parties who provide services for us including specifically Salesforce and Dotmailer as Data Processors. We select our third party service providers with care and provide them with the information that is necessary to provide the service. There is an agreement in place which requires them to operate with the same care over data protection as we do.
- Other organisations with which we run joint events.
- Analytics and search engine providers that help us to improve our website and its use.

Information which you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. This is because data stored with both Salesforce and Dotmailer might be kept on servers outside the EEA. We meet our obligations under GDPR by ensuring that the information has equivalent protection to that held within the EEA. We do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a Data Processing Agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

Keeping your information up to date

We would really appreciate it if you let us know if your contact details change. You can do so by contacting us at warrants@rwha.co.uk.

How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity. For Royal Warrant related activity, the information will be destroyed 10 years after a company no longer holds the Royal Warrant or when a person leaves that company. The only exception being that the names of grantees only who were appointed during the company's tenure of the Royal Warrant will be retained for the RWHA archive. For suppliers and contractors, we will only hold personal details for as long as we are legally obliged to.

Where we rely on your consent to contact you for marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. With specific regard to fundraising for the RWHA Charity Fund this will usually be for two years. We may periodically ask you to renew your consent.¹

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request contact us at warrants@rwha.co.uk

You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the “right to be forgotten”);
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”);
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact the CEO & Secretary at the above address.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner’s Office. Further details about how to complain can be found [here](#).

Changes to this Privacy Policy

This Policy may be changed from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information.

Please check this Policy each time you consider giving your personal information to us.

25 May 2018

¹ The Fundraiser Regulator states that the period should be assessed having regard to how long the individual would consider it reasonable to be contacted before they are asked to renew consent. (See Fundraiser Regulator’s Personal Information and Fundraising: Consent, Purpose and Transparency 21 February 2017 www.fundraisingregulator.org.uk).