

## **Privacy Policy - 878 AD: Winchester Revealed**

### **Introduction**

This Privacy Policy applies to your use of our '878 AD: Winchester Revealed' mobile application software ("App") which we make available via the Apple App Store and Google Play Store (each an "App Site").

This policy applies once you have downloaded or streamed a copy of the App onto your mobile telephone or other handheld device ("Device").

Please read the following carefully to understand our practices regarding your personal data.

### **Important information and who we are**

Hampshire Cultural Trust (company number 08986225) is the data controller and is responsible for your personal data ("we", "us" or "our" in this policy). We are a charitable company registered in England and Wales with company number 08986225 and registered charity number 1158583.

Questions, comments and requests regarding this privacy policy should be addressed to [data@hampshireculturaltrust.org.uk](mailto:data@hampshireculturaltrust.org.uk).

You can also contact us by post to Data Protection, Hampshire Cultural Trust, Chilcomb House, Chilcomb Lane, Winchester, Hampshire, SO23 8RD.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues. For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 30 September 2022.

This policy may change and if it does, the changes will be posted on this page and, where appropriate, notified to you by email and/or when you next start the App. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

### **Third party links**

The App may link to our website at [www.hampshireculturaltrust.org.uk](http://www.hampshireculturaltrust.org.uk). For information about how we collect and use your personal data when you visit our website, please read our main Privacy Policy at [www.hampshireculture.org.uk/privacy-policy](http://www.hampshireculture.org.uk/privacy-policy).

The App may also contain links to the websites of third parties related to the 878AD historical exhibit. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

### **The data we collect about you**

We may collect, use, store and transfer personal data about you which we collect via the App Site you used to download the App. Usually this personal data will be a unique reference number or account number attributed to your device or your account on the App Site. If the App Site shares it with us, or you leave a review for the App on the App Site, then we may also process your full name.

We do not collect any other personal data about you. For the avoidance of doubt, we do not collect any 'special categories' of personal data about you (e.g. details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We do not collect any location data about you.

### **How is your personal data collected?**

We collect information about you via the App Site. This is limited to information provided by you (or your device) when you download the App or leave a review on the App Site.

### **Cookies**

We do not use cookies in the App.

We do use cookies on our main website at [www.hampshireculturaltrust.org.uk](http://www.hampshireculturaltrust.org.uk). For more information about those cookies please see our Cookies Policy at [www.hampshireculture.org.uk/cookies-policy](http://www.hampshireculture.org.uk/cookies-policy).

### **How we use your personal data**

We will only use your personal data when the law allows us to do so. We process your personal information in the context of the App because we have a legitimate interest in keeping a record of users who have downloaded the App and to keep track of reviews and feedback we receive from users of the App.

We do not use the personal data we collect from you regarding the App to send you direct marketing. However, you may receive marketing communications from us if you have separately signed up to receive our newsletter or other updates.

### **Disclosures of your personal data**

We may share your personal information with our outsourced service providers, such as our App developers. We may also share your personal data with the App Site from which you downloaded the App.

### **International transfers**

We do not transfer your personal data outside the UK.

### **Data security**

All information you provide to us is stored on our secure servers.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

### **Data retention**

We keep a record of your personal data for six years after the date of downloading our App.

In some circumstances you can ask us to delete your data: see the next section of this Policy for further information.

### **Your legal rights**

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us using the postal or email address set out at the start of this policy.