



PRIVACY POLICY

Achates is dedicated to protecting the privacy of its clients and any relevant third-party data to support its clients' services in agreement with the client. Achates Philanthropy will only use and store any relevant client data for the purposes of supporting an agreed client project and will do so in accordance with the Data Protection Act (1998), the Privacy and Electronic Communication Regulations (2003), the 25 May 2018, the EU General Data Protection Regulation (EU 2016/679) and the more recent GDPR UK directives (with the addition of SCC's where appropriate).

Achates Philanthropy is a Company Limited by Guarantee Registered in England and Wales, Company No. 8970512

Who we are

Achates is a company which provides strategic planning and fundraising services and brings together a team of highly experienced cultural sector managers and fundraisers to offer an ethical, tailored approach to organisations of all sizes – helping them achieve a long-term, sustainable position and maximise the impact of their work.

Our ethos is based on quality of service and that's how we came by our name. In Virgil's *Aeneid*, Achates was the close friend and loyal advisor of Trojan leader, Aeneas. We thought this described the exact relationship we offer our clients.

What data we collect

We mainly process data which is required by law (Lawful Basis) and in order to meet our aims and objectives and monitor the impact and successful delivery of our activities (Legitimate Interests) but we may process data under the other legal bases if required.

Information we collect can include:

Personal data - the subject's name, postal address/geographical location, job title, email address, phone number, age, gender, ethnicity, disability status

Financial data - bank, credit/debit card details, transactional details about payments to and from you and other details of services you have purchased from us.

Technical Data - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

Profile Data - your username and password, your interests, preferences, feedback and survey responses.

Usage Data - information about how you use our website and services.

Marketing and Communications Data - your preferences in receiving marketing from us and our third parties and your communication preferences.

Special Category Data - details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, trade union membership or information about your health.

We do not usually collect 'sensitive personal data' from a subject unless there is a clear reason for doing so, such as for health concerns, criminal disclosures or where we need this information to ensure that we provide appropriate support, and to enable you to benefit from everything we offer, or where the client provides services to users with specific needs or requirements.

Under 18s and adults at risk without such consent are not allowed to provide us with personal information.

How we collect data

We may collect information in a number of ways such as when you:

- Contact us through email, telephone or in person
- Enquire about our services
- Undertake any contract or engagement with us
- Join our mailing list or become a member
- Apply for a job or to volunteer
- Buy a ticket to one of our events
- Engage with our social media or visit our website
- Through clients, third parties or publicly available sources such as Companies House

We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

Our work with clients

Achates needs to collect and use certain types of information about the clients, customers or businesses who come into contact with us in order to carry on our work. This includes staff, clients, contractors, volunteers, statutory, community and business contacts, donors and funders. The client remains the data controller and Achates Philanthropy will only work with clients on the basis that their own data processing practice is in line with Achates' practice.

Our clients include national cultural organisations through to public sector statutory bodies, charities and private sector corporate clients, all of whom we support with a range of fundraising and strategic planning services to enable the development of their organisational objectives.

Clients may provide us with samples of their data in order to inform our work to support their fundraising or strategic planning. This data may represent existing users, audience members and donors and will often have been collected in a variety of ways by the client including when purchasing a ticket or a membership, making a donation, signing up to projects or programmes, joining a mailing list or registering on a website.

This data will be supplemented with intelligence collected from publicly available sources which may include obtaining information from clearly identified stakeholders, for instance interviewees. Data will only be processed in agreement with our clients, where it is necessary

to support clients to carry out their business or to deliver on their charitable/business objectives.

How do we protect client data?

Achates adopts robust and appropriate policies to protect data samples shared by clients. Our work is delivered by our expert team of staff and freelance Associates who work to our high professional standards and are regularly briefed on legislation pertinent to their working practice to ensure best practice standards. Staff and Associates maintain data-processing protocols in line with our client Data Processing Agreements. Any agreed data sample will be requested from clients via a secure data transfer platform and will be stored securely and confidentially. Any data sample will be held by Achates for a maximum period of two months following the conclusion of a project, unless otherwise specified and agreed with the client.

Job applicants, staff and associates

If you apply to work at Achates or for any of our clients through our Recruitment Division (Achates Recruits), we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside Achates, for example, if we need a reference, we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we may hold your personal information for up to 12 months after we've finished recruiting for the post you applied for. After this date we will destroy or delete your information. We keep de-personalised statistical information about applicants to develop our recruitment processes; however no individual applicant would be identifiable from this information. If you commence employment with Achates, your data will be processed in accordance with your employment contract and other applicable policies.

If you enter into an engagement with us, we will process and maintain your data in order to comply with employment law and to ensure the smooth administration of the organisation. Your data may be shared across departments and with partners and contacts in order to fulfill the obligations of the post.

How we keep it safe

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy policy.

Your personal data will be held and processed in accordance with Achates' Data Protection procedures. Once we have received your information, we will use our Data Protection procedures and security features to prevent unauthorised access or breaches. All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. We will notify you of any such sale in advance and obtain necessary permissions for the transferring of personal data.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Achates, our clients, or

others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- If a consultant or contractor is engaged to perform work on behalf of Achates
- If a contact is looking for a recommendation (we will ask you first).

Who we share our information with

To undertake our services we sometimes have to share your information with third parties such as our CRM database, ticketing software, IT providers and our marketing services, which handle our direct communications with you. We may share anonymised personal information with other organisations, particularly funders and audience development agencies. We only choose partners we trust and will only pass personal data to them if they:

- abide by the requirements of the Data Protection Act and GDPR
- treat your information as carefully as we would
- only use the information for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation)
- allow us to carry out checks to ensure they are doing all these things.

However, we are not responsible for the privacy policies or practices of third party websites. Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent.

Third parties we use are:

Mailchimp – our direct marketing communications service.

<https://mailchimp.com/legal/privacy> Mailchimp holds the email addresses of our subscribers and users to provide and operate their services.

Eventbrite – our ticketing software

https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lq=en_GB

SurveyMonkey – Our online survey software

<https://www.surveymonkey.co.uk/mp/legal/privacy/>

NatWest Bank – our company bank account

<https://personal.natwest.com/personal/privacy-policy.html>

Xero – Our accounting Software

<https://www.xero.com/uk/about/legal/privacy/>

Capsule – Our CRM software

<https://capsulecrm.com/privacy/>

Basecamp - Our project management software and database

<https://basecamp.com/about/policies/privacy>

Google drive – Our secondary, internal database

<https://policies.google.com/privacy>

StudioF - our website. They analyse the volume of traffic, browsing actions and patterns in order to improve the services they offer.

<http://www.studiof.org.uk/>

We use Google Analytics on our site to find out about the volume of traffic to our site and our users' browsing actions and patterns. <https://www.google.com/policies/privacy/partners/>

Cookies

We may gather information about the use of our website, such as your IP addresses, geographical location, browser type, referral source, which pages are most visited and which events or facilities are of most interest. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

The Achates website site, like many others, uses small files called cookies to help customise your experience. 'Cookies' are small text files that are stored by the browser on your computer or mobile phone. Websites are able to read and write these files, allowing them store things such as personalisation details or user preferences and interests. Cookies provide a "memory" for the website, enabling it to recognise a user and respond appropriately, speeding up your searches and recognising you when you return to our site. Each web domain can only access cookies stored by that specific web domain, meaning that only the Achates servers can access the cookies set by the achatesphilanthropy.com domain.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Please note that our third party websites, advertisers and suppliers may also use cookies, over which we have no control.

Due to the web-based nature of many of the third-party services listed above, data is occasionally distributed and transferred to servers located outside the EU. We have made every effort to ensure that the third-party service providers we use adhere to relevant EU laws and regulations for data privacy and protection. For third-party companies and services with data centres and servers in USA, we have ensured that they are all compliant with the EU-U.S. Privacy Shield Framework – more information on the Framework is available here: <https://www.privacyshield.gov/welcome>

External links

Our may website contain links to other sites whose information practice may be different to ours. You should consult other sites' privacy notices as we have no control over information that is submitted to or collected by third parties. Furthermore, we cannot guarantee the privacy of personal information you transmit over the web or that may be collectable in transit by others.

Retention and disposal

We will retain your information for the duration of your affiliation with Achates and for reasonable period or as long as our contractual agreement or the law requires or permits.

We will maintain records of personal contact information for as long as there is a reasonable likelihood of you maintaining a connection with the company or making a further booking for an Achatés event.

If you make any payments using a credit card, we will retain a paper copy of your credit card details (last 4 digits) for a length of time reasonably necessary to process any future transactions related to your purchases, including refunds and charge-backs; and for any period legally required.

Your rights to access

You have the following rights related to your personal data:

- The right to request a copy of personal information held about you
- The right to request that inaccuracies be corrected
- The right to request us to stop processing your personal data
- The right to withdraw consent
- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

You can opt out from these marketing communications at any time - every email sent to you will tell you how to do this. You can also change any of your marketing preferences at any time by contacting info@achatesphilanthropy.com We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes.

Please direct all requests for the information we hold about you to: info@achatesphilanthropy.com or write to Achatés Philanthropy, 39 Sulina Road, London, SW2 4EL.

You have the right to complain to the Information Commissioner's Office if we have not been able to satisfactorily resolve a problem about our handling of your personal information. For more information about your Data Protection rights, please visit the website of the Information Commissioner's Office at www.ico.org.uk