

## **Scone Palace Privacy Notice**

Stormont Trading; The Earl of Mansfield's 1992 Trust; The Scone Palace Maintenance Trust; The Executors for the 8<sup>th</sup> Earl of Mansfield; The Trustees of the Scone Estates Retirements Benefits Scheme, collectively referred to as Scone Palace

("We") are the Data Controller of any personal data we collect or obtain about you. We take your privacy very seriously. We have created this privacy notice which aims to give you information on how we collect and process your personal data through your use of this website **or** when you otherwise interact with us, including any data you may provide when you supply services to us, sign up to our newsletter, book a visit, enter a competition or book accommodation.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you (e.g. when purchasing a Season Ticket) so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and policies and is not intended to override them.

If you have any concerns about our processing of your personal data please contact [estate@scone-palace.co.uk](mailto:estate@scone-palace.co.uk)

### **What is personal data?**

Personal Data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Category of Data: means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

When we use the term 'personal data' we mean both personal data and special category of data.

### **What personal data are Scone Palace processing and where from?**

We will process any personal data you submit via this website, visitors book, comments forms, competitions, exhibitions, trade shows, ticket bookings, seminars or other communications with us or when you or the organisation you represent supplies us with services. The personal data collected may include your name, email, address, telephone, preferences and/or any information you may tell us. If you purchase something from us via the website or over the telephone, your bank details are collected and processed by a third party payment provider. We do not collect bank details from you – an exception to this may be if you provide us with services in which case we may collect bank details so we can pay you.

We usually collect all personal data directly from you. However, there are some cases where we collect personal data indirectly. For example, our service providers may provide us with contact details (name, email address and/or telephone number) of their staff members or representatives that will provide or coordinate the services on their behalf. Further, sometimes third parties represent us at trade shows and similar events and they may collect personal data from individuals who have consented to receive e-marketing communications from us.

We may also collect personal data about you using Cookies. Cookies are small text files that are stored on your computer or mobile device when you visit Scone Palace's website. Please read our Cookie Policy for further information.

### **Why is Scone Palace processing my personal data?**

The reason why we are processing your personal data will depend on the circumstances. Most processing will fall into one or more of the following categories:

- Where we are responding to an enquiry. In which case, by submitting the enquiry you consent to our processing in so far as is necessary to respond to you;
- To supply you with goods and/or services that you have requested e.g. where you have bought a hamper, applied for a Season Ticket or booked accommodation via our website. In such cases it will be necessary for us to

process your personal data to allow us to perform our obligations under such a contract. If you do not provide us with the necessary information, we may not be able to supply you with the requested good or service;

- Where we have your consent to send you marketing communications.
- Where we need to comply with a legal or regulatory obligation.
- Maintaining our accounts and records; administration of membership records; creating and maintaining databases of sales; creating and maintaining a list of marketing contacts; creating and maintaining a list of attendees of our events; statistical analysis and conducting market research surveys; assessing and evaluating the use that is being made of the website; and information and databank compilation and administration. For data protection purposes, we undertake this processing as we have a legitimate business/commercial interest in doing so. For example, it is important that we keep records of our accounts and our memberships, that we understand use of our website for continuous improvement purposes and that we can process your personal data for general administration purposes.
- to engage with service providers or a point of contact at one of our service providers, in which case it is necessary to process some personal data to manage and perform the service contract e.g. we need to know personal contact information of a representative of a supplier so we can manage the relationship and pay for services.

### **Where will Scone Palace keep my personal data?**

Your personal data will be kept within the European Economic Area except where you have consented to receive e-marketing communications from us in which case we use Mailchimp to do this. Mailchimp's servers are in US so your name and email address will be held by Mailchimp in the US. Mailchimp is a member of the EU-US Privacy Shield, which is a privacy standard approved by the EU Commission certifying that such member US companies has adequate security measures in place.

### **Will my personal data be shared with a third party?**

We will not share your personal data with a third party except where we are using a third party supplier to deliver some services to us, in which case we shall take appropriate measures to ensure any such supplier has appropriate security in place to keep your information safe and we shall ensure we have appropriate contractual terms obliging them to keep the information safe.

We use MailChimp as our e-mail marketing tool, We only share your name and email address with Mailchimp to send you marketing communications you have requested. You can find out more about MailChimp's privacy statement here: <https://mailchimp.com/legal/privacy/>

We use a PR Agency to assist with our e-marketing communications and to do so they require access to our Mailchimp account. Therefore, if you have consented to

receive marketing messages from us, our PR Agency will have access to your name and email.

Otherwise, we will not share your personal data unless we are obliged by law or regulatory obligation to which we are subject or where our assets are bought by a third party.

### **Is my personal data safe?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

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 personal data transmitted to Scone Palace via the internet; any transmission is at your own risk.

### **Marketing**

If you have opted-in to join our mailing list, we will only contact you to keep you up to date with Scone Palace news, events and promotions. You can unsubscribe from our marketing list at any time by clicking on the unsubscribe button in each email and/or contacting [estate@scone-palace.co.uk](mailto:estate@scone-palace.co.uk)

### **Links to other websites**

Our website may contain links to other websites of interest and which belong to third parties. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question

### **How long will Scone Palace retain my personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **Your Rights**

You have the right to:

**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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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, the personal data you have provided to us 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.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You can exercise your rights by contacting [estate@scone-palace.co.uk](mailto:estate@scone-palace.co.uk)

### **Changes to the Privacy Notice**

We reserve the right to amend this privacy notice. However any changes we may make to our privacy notice in the future will be posted on our website [www.scone-palace.co.uk](http://www.scone-palace.co.uk)

This version was last updated on 8<sup>th</sup> March 2019.