

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website users, newsletter subscribers and contributors.
- 1.2 In this policy, "we", "us" and "our" refer to The History of Parliament Trust. For more information about us, see Section 12.
- 1.3 Please note: our obligations under UK data protection law are limited where we are processing personal information with a view to the publication of journalistic, academic, artistic or literary material, in circumstances where we reasonably believe that:
- (a) the publication of the material would be in the public interest, taking into account the public interest in the freedom of expression and information, and relevant codes of conduct; and
 - (b) the application of the relevant obligations would be incompatible with these purposes.

2. The personal data that we collect

- 2.1 In this Section 2, we have set out the general categories of personal data that we process and information about the source and specific categories of that data.

Data category	Data content	Source of data
Contact data	Information we use to get in touch with you. The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers.	You
Communication data	Information contained in enquiries and communications that you send to us or that we send to you, along with metadata associated with enquiries and communications.	You – although our website will generate metadata associated with use of our website contact forms
Social media data	Information we collect automatically from social media services when you use certain features on our website – such as share and like buttons.	Your social media services

Comment data	Personal information you share with us when submitting a comment for publication on our website – this may include information in the comment itself, as well as your name and email address.	You
Contributor data	Personal information you share with us as a contributor to our historical and academic publications, including information associated with blog posts and audio recordings, which may include your name, email address and telephone number.	You
Website usage data	The data about your use of our website and services, which may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.	Our web analytics system

3. Purposes of processing and legal bases

3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.

Purpose of processing	Details	Legal basis of processing
Operations	We may use your personal data for the purposes of operating our website and running our organisation generally.	Legitimate interests: the proper administration of our website and organisation
Relationships and communications	We may use contact data, communication data and social media data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post and/or telephone, and complaint handling.	Legitimate interests: communications with our website users, newsletter subscribers and contributors; the maintenance of our relationships; enabling the use of our website; and the proper administration of our website and organisation
Publications	We may publish contributor data, comment data and social media data on our website and	Legitimate interests: issuing publications in

	elsewhere in accordance with any licence you grant to us and may otherwise store and process this data for this purpose.	accordance with our goals and constitution
Direct marketing	We may use contact data for the purposes of creating, targeting and sending our newsletter (and other direct marketing communications) by email and/or post.	Consent
Research and analysis	We may use your personal data for the purposes of researching and analysing the use of our website, as well as researching and analysing other interactions with our organisation.	Legitimate interests: monitoring, supporting, improving and securing our website and organisation generally
Record keeping	We may use your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our organisation records generally.	Legitimate interests: ensuring that we have access to all the information we need to properly and efficiently run our organisation in accordance with this policy
Security	We may use your personal data for the purposes of security and the prevention of fraud and other criminal activity.	Legitimate interests: protection of our website and organisation, and the protection of others
Insurance and risk management	We may use your personal data where necessary for the purpose of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice.	Legitimate interests: the proper protection of our organisation against risks
Legal claims	We may use your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.	Legitimate interests: protection and assertion of our legal rights, your legal rights and the legal rights of others

Legal compliance and vital interests	We may use your personal data to stay compliant with applicable law regulations.	Compliance with legal obligations and protection of vital interests
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4. Providing your personal data to others

4.1 We use a range of services providers. These services providers will from time to time handle personal data on our behalf, as detailed in the following table.

Services	Current provider	International transfer information
Website hosting, support and maintenance	WordPress.com	https://wordpress.com/support/your-site-and-the-gdpr/
Event booking service and register	Eventbrite	https://www.eventbrite.co.uk/help/en-gb/articles/363929/eventbrite-eu-data-protection/
Website traffic analysis	Google Analytics	https://business.safety.google/ads/datatransfers/?sjid=15680004434681296864-EU

4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

4.3 We may share contributor data with our academic and research partners, including the British Library. Our partners will usually act as independent controllers of shared data, and accordingly their use of that data will be subject to their own privacy notices.

4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfer and publication of data

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred internationally.
- 5.2 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states benefit from adequacy regulations under UK data protection law.
- 5.3 Our service providers are based in the UK, EEA and USA, and your personal data may be transferred internationally in connection with our receipt of their services. We will comply with all applicable data protection laws in relation to transfers to these services providers, and where necessary will ensure that either:
- (a) the competent data protection authorities have made an adequacy determination with respect to the data protection laws of relevant jurisdictions; or
 - (b) relevant transfers are protected by appropriate safeguards, such standard data protection clauses adopted or approved by the competent data protection authorities.

For more information about the processing of your personal data by our services providers, see the table in Section 4.1 above.

- 5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

- 6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data for not more than the maximum retention period set out in the following table (which periods begin upon the relevant reference date):

Data category	Maximum retention period	Reference date
Contact data	7 years	Date of the most recent contact between you and us (although where processing is based on consent, we will delete the data if you withdraw that consent)
Communication data	7 years	Date of communication
Social media data	7 years	Date of collection
Comment data	7 years	Last date of publication
Contributor data	7 years	Last date of publication
Website usage data	26 months	Date of collection

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

Your rights	What you can do
Right to access	You can ask for copies of your personal data
Right to rectification	You can ask us to rectify inaccurate personal data and to complete incomplete personal data
Right to erasure	You can ask us to erase your personal data
Right to restrict processing	You can ask us to restrict the processing of your personal data
Right to object to processing	You can object to the processing of your personal data
Right to data portability	You can ask that we transfer your personal data to another organisation or to you

Right to complain to a supervisory authority	You can complain about our processing of your personal data
Right to withdraw consent	If the legal basis of our processing is consent, you can withdraw that consent

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/>

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies used on our website

9.1 We and our services providers may use cookies for the following purposes:

- (a) **authentication and status** - we use cookies to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website;
- (b) **personalisation** - we use cookies to store information about your preferences and to personalise our website for you;
- (c) **security** - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (d) **analysis** - we use cookies to help us to analyse the use and performance of our website and services); and

- (e) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally).

10. Managing cookies

10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can obtain up-to-date information about managing cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/products/firefox/privacy-and-security> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.apple.com/en-gb/guide/safari/welcome/mac> (Safari); and
- (e) <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).

10.2 Blocking all cookies will have a negative impact upon the usability of many websites.

10.3 If you block cookies, you will not be able to use all the features on our website.

11. Amendments

11.1 We may update this policy from time to time by publishing a new version on our website.

11.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

11.3 We may notify you of significant changes to this policy by email.

12. Our details

12.1 This website is owned and operated by The History of Parliament Trust.

12.2 We are registered charity in England and Wales under charity number: 1202089.

12.3 Our principal office is at 14-18 Old Street, London, EC1V 9BH.

12.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website; or
- (d) by email, using the email address published on our website.