

Kennington Chartist Project

Privacy Policy

Privacy - We Lovett!



(Our Privacy Policy is inspired by William Lovett, the tireless administrator and driving force behind the early organisational and bureaucratic elements of early Chartism).

The EU General Data Protection Regulation (effective under UK law from 25 May 2018) requires all organisations to take steps to ensure that any personal data they hold is secure and not held for longer than is reasonable. This legislation applies to the Kennington Chartist Project and this document explains our policy and approach.

Our principles and practice

- We have a duty of care to the people whose data we hold
- We do our very best to protect your privacy by holding the minimum amount of data to allow us to contact you.
- We will never sell, rent or otherwise distribute or make public your personal information
- We do not share your data with other organisations unless someone we trust has offered administrative assistance to help out by contacting people on our behalf, and we have explicitly approved or provided the content of that contact. (E.g. getting in touch with volunteers).
- Personal data is the responsibility of the Project Manager, and may be accessed by the volunteer coordinator, or steering group.
- It is held in a password protected Google 'cloud' account, and on MailChimp servers, which we will not access from public computers.

How we obtain data

At present, we may obtain personal data through:

- Paper-based signup sheets at our events and project stands
- Asking by personal email if you would like to be put on the mailing list
- Website mailing list signup www.kenningtonchartistproject.org
- Twitter account

Access to any electronic services is password protected and restricted to the Project Manager, Volunteer Coordinator, members of the Steering Group, or other volunteer that we trust, acting with the express approval of the Project Manager / Steering Group.

What information do we hold?

We will only hold your name, email address, phone number if relevant, and notes related to the areas of our project that you may have expressed an interest in. We will not hold residential addresses unless you offer them because they are of historic interest, or for practical arrangements.

Why we hold your data and how we use your personal information

The Kennington Chartist Project holds personal data relating to people who have asked to be kept update about our project, or have told us they are able to volunteer. All names and addresses have been collected since September 2017 and only when people have given their explicit consent to be put on the mailing list.

We will use this data to:

- Update you about walks, talks, events, research and website updates.
- Ask your opinion about elements of the project, or what we should do in the future.
- Ask for your help with volunteering or other aspect of the project.

PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

Site visitation tracking

Our site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor. Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

Contact forms and email links

Should you choose to contact us using the contact page on our website or an email link like this one, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

Email newsletter

We use double opt-in when you subscribe to our email newsletter. The email address that you submit to us will be forwarded to MailChimp. We consider MailChimp to be a third party data processor (see section 6.0 below). The email address that you submit will not be stored within this website's own database or in any of our internal computer systems.

Your email address will remain within Mail Chimp's database for as long as we continue to use Mail Chimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list. If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter.

While your email address remains within the Mail Chimp database, you may receive periodic newsletter-style emails from us.

HOW WE STORE YOUR PERSONAL INFORMATION

Our current mailing list provider is Mailchimp.com. Data held by MailChimp (or other communication providers) will be limited to names and email addresses. Access to this information will be password protected and is restricted to the Project Manager, members of the Steering Group, and anyone helping with publicity with the express approval of the Project Manager or Steering Group.

Our project is planning towards the 175th Anniversary of the Chartist Rally on Kennington Common in 2023. We therefore intend that the mailing list stays live and active until after that time. Data held to be reviewed in 2024.

ABOUT OUR WEBSITE'S SERVER

The Kennington Chartist Project website is hosted by Best Host within a UK data centre in Byfleet, Surrey KT14 7JU. Some of the data centre's more notable security features are as follows:

- * 24 x 7 x 365 manned facility
- * Full external perimeter colour / low light 'Pan Tilt & Zoom' (PTZ) cameras
- * Internal infrared cameras covering all doors, entrances and exits
- * CCTV footage stored for 91 days
- * Movement detectors covering entire external perimeter and connected to an annunciator
- * External tannoy system
- * Building and car park located in gated compound with fenced perimeter (remotely locked after 6.30pm Mon - Sat and all day Sun)
- * Proximity access cards for your nominated staff members are required on all doors leading to and within the datafloor
- * Multi-Pass! Our access cards can be pre-programmed to give privileged access to certain areas of the data centre
- * Anti-passback on main datafloor door
- * Individually locked racks with 3-digit combination code
- * Optional caging with key or HID (proximity) locks
- * ~~Decorative truncheons~~

OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2.0. Both of these third parties are based in the USA and are EU-U.S Privacy Shield compliant. * Google (Privacy policy) * Mail Chimp (Privacy policy)

DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

Your rights

If you need to update the details we hold about you or want to change your preferences about how we contact you please contact the Project Manager by emailing:

mail@kenningtonchartistproject.org Please mark your email **Data Protection**.

Data may be updated by email at any time by your specific request which we undertake to process within 7 days, but not exceeding 31 days. If you have any questions or complaints about the way in which we are using your data please contact the Secretary of the Friends of Kennington Park by emailing friends@kenningtonpark.org.

Please mark your email **Comments and Complaints**.

Publishing our policy

We will publish this Policy on our website.

Policy Approval and Review

This Policy is approved by the Kennington Chartist Project Steering Group, and will be reviewed every 2.5 years. Next review Nov 2020.