

PRIVACY POLICY

Welcome to our privacy policy.

The Merchants House of Glasgow is a Scottish registered charity (SC008900) (“**we**”, “**our**”, “**us**”, “**Merchants House**”).

This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

We may revise this privacy policy at any time by amending this page. You are expected to visit this page from time to time to note any changes we make, as they affect you.

HOW TO USE THIS PRIVACY POLICY

The General Section of the privacy policy applies to the use of all personal information gathered by us. Please read this section carefully. There are then specific Section(s) that will or will not apply to you depending on how you interact with us. Please read the relevant sections that apply to you.

1. **General Section:** For anyone that interacts with Merchants House or Ship Venture
2. **Member Section:** If you are a Member of Merchants House or are applying for Membership
3. **Beneficiary Section:** If you are a direct beneficiary of Merchants House, or a beneficiary of one of the Trusts which Merchants House manages, or are applying for funding as a potential beneficiary
4. **Donor Section:** If you make a donation to Merchants House
5. **Grant Applicant Section:** If you apply for a grant with Merchants House on behalf of the registered charity which you represent
6. **Event Section:** If you attend one of our events
7. **Venue Hire Section:** If you hire our venue for your own functions or events
8. **Website Section:** If you visit our Website and / or contact us through our Website
9. **Marketing Section:** If you receive marketing communications or updates from us

Please click on the links above for further information.

1. GENERAL SECTION

1.1 GLOSSARY

When we refer to **Data Protection Legislation** we mean the General Data Protection Regulation (Regulation (EU) 2016/679) (**GDPR**) and the Data Protection Act 2018.

Criminal conviction data means personal data relating to the alleged commission of offences by you; or proceedings for an offence committed or alleged to have been committed by you or the disposal of such proceedings, including sentencing.

A **data controller** is someone who decides why personal data is to be collected and how it will be used and treated.

ICO means the UK Information Commission’s Office, the UK supervisory authority for data protection issues.

Personal information / data is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, email address, etc., and also online identifiers and location data such as IP addresses and mobile device IDs.

Special category data means personal information revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs; or trade union membership; genetic data; biometric data; data related to your health or data concerning your sex life or sexual orientation.

Ship Venture means Ship Venture Limited (Company Number SC166242) with its registered office at: 7 West George Street, Glasgow, Scotland, G2 1BA.

Website means: <https://www.merchantshouse.org.uk/>.

1.2 ABOUT US

You can find out more about Merchants House here: <https://www.merchantshouse.org.uk/aboutus>.

Ship Venture is a wholly owned trading subsidiary of Merchants House. All of the proceeds from Ship Venture are donated to Merchants House. Ship Venture act on behalf of Merchants House to organise events and to hire the Merchants House's premises.

1.3 CONTACT US

If you have any questions regarding this privacy policy you can contact us at:

- Address: 7 West George Street, Glasgow G2 1BA
- Telephone: 0141 221 8272
- Email: info@merchantshouse.org.uk

1.4 COMPLAINTS

You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.5 YOUR RIGHTS

- 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.
- 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.
- 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 can exercise your rights by contacting us at the contact details noted above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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.

We may not always be able to comply with your request to exercise your rights for specific legal reasons which will be notified to you.

Further details about your rights can be found on the ICO's website at <https://ico.org.uk/>

1.6 DO WE SHARE PERSONAL INFORMATION?

We will not sell, trade or lease your personal information to others.

We contract with third party service providers and suppliers to deliver certain services. Our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Our service providers change from time to time and we will inform you if this is the case by updating this privacy policy.

- Ship Venture who is our trading subsidiary and who collects and processes certain information on our behalf. All the proceeds from Ship Venture Limited are donated to Merchants House.
- The Trustees of Merchants House will have access to your personal data to determine whether you are suitable to be admitted as a Member, or to assess your application for funding.
- Zoho CRM who currently host and maintain our CRM system.
- System Integrity who currently provide our IT support.
- Microsoft hosts our email via Office 365.
- Our website is hosted and operated by Inspire Services.
- We use Dropbox to file certain documentation.
- If you sign-up to one of our events, you may be asked to do so via Eventbrite.
- We use Mailchimp to send email communications to Members.
- We use SurveyMonkey to host and manage feed-back forms and questionnaires.
- We may use third party caterers for our events or your events.

We will also provide your personal information to third parties where there is a legal obligation to do so, for example to regulators, government departments, law enforcement authorities, tax authorities and any relevant dispute resolution body or the courts.

We may also provide your personal information to third parties in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in our business.

We will provide information about you to any other person who is authorised by you to act on your behalf.

1.7 WHERE DO WE STORE YOUR INFORMATION

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to correspond with you. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We also may transfer data outside the UK or the EEA where our service providers host, process, or store data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with the Data Protection Legislation.

SurveyMonkey, MailChimp, and Eventbrite may transfer data to their respective US entities. Where this is the case those US entities are registered with the EU-US Privacy Shield which is an adequate measure under the Data Protection Legislation (and means that your personal data will be treated according to UK standards).

1.8 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

We will not hold your personal information for any longer than is necessary for the uses outlined above, unless we are required to keep your personal data longer to comply with the law and any regulatory 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.

1.9 HOW DO WE KEEP YOUR PERSONAL INFORMATION UP-TO-DATE?

Please contact us at using the details above as soon as possible after there is any change to your personal details, including your contact details.

1.10 SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online and offline.

2. MEMBER SECTION

If you are a Member of Merchants House or are applying for Membership please read this section.

We collect personal information about you from the following sources:

- You, when you correspond with us by email, phone or letter or when you complete our Member Application Form.
- From our CCTV system if you attend our premises.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing Member benefits), or we may be prevented from complying with our legal obligations.

If you do not sign the Matriculation book located at our premises then we will not be able to process and complete your Membership application.

As your Membership is a life membership, we will generally hold onto your personal details for the duration of your life.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data Conviction
Your personal and business contact details such as your name, email address, telephone number, and postal address	We require this information so that we can correspond with you in relation to your membership.	Necessary for the membership contract or for taking steps to enter into the contract.	N/A
	To notify you of our AGMs.	This is a legal requirement placed on us.	N/A
	To contact you with information on our upcoming events and our offers.	We may send you non-electronic forms of marketing communication (post and live calls) based on our legitimate interest. [We will only send you email marketing communications address with your explicit consent.]	N/A

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data Conviction
	To provide you with updates on what we are doing.	Our legitimate interests of keeping our members informed.	N/A
	When you decide to provide Gift Aid we are required to collect and obtain your name and address.	This is a legal requirement placed on us.	N/A
Details as to the nature of your business and your position	To ensure that you meet the requirements of Membership.	Necessary for the membership contract or for taking steps to enter into the contract.	N/A
	We may ask you to complete a skills audit so that your services can be utilised by Merchants House and its members as is the spirit of your membership with us.	This is on the basis of our legitimate interests.	N/A
CCTV images	To detect and prevent criminal activity and to safeguard those in the building.	Our legitimate interests of keeping our staff and tenants safe.	N/A
Your father's name, address and profession	When you apply for membership as part of the process you are asked to complete our historical matriculation book which requests these details. We ask for this information as it is in-keeping with our traditional practices.	Our legitimate interests of continuing our traditional practices. If you feel uncomfortable providing this information then you do not require to provide the same. Where you do provide this data, you acknowledge and agree that you have informed your father that you are providing this information to us.	N/A

3. BENEFICIARY SECTION

If you are a direct beneficiary of Merchants House, or are applying for funding as a potential beneficiary of Merchants House please read this section.

We collect personal information about you from the following sources:

- We may initially receive your name and contact details by referral from another charitable organisation or one of our Members.
- You, when you correspond with us by email, phone or letter or when you complete our Application Form and renewal forms, and information that you provide in support of your application.

If you fail to provide certain information when requested, we may not be able to fully consider your application or we may not be able to perform the contract we have entered into with you (such as providing the funding).

We apply the following retention periods: We will retain your details for 6 years following your last award

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data Conviction
Your personal contact details such as your name, email address, telephone number, and postal address	We require this information so that we can correspond with you in relation to your beneficiary options, your application for funding and any funding provided by us.	Necessary for the beneficiary contract or for taking steps to enter into the contract.	N/A
Your date of birth	To allow us to consider whether you are suitable for consideration as a beneficiary.	Necessary for the beneficiary contract or for taking steps to enter into the contract.	N/A
Your occupation	To allow us to consider whether you are suitable for consideration as a beneficiary.	Necessary for the beneficiary contract or for taking steps to enter into the contract.	N/A

<p>Your marital status</p> <p>If applicable, your spouse's occupation.</p> <p>If you are widowed, your spouse's name and date of death.</p> <p>This may disclose details of your sexual orientation which is special category data.</p>	<p>To allow us to consider whether you are suitable for consideration as a beneficiary.</p>	<p>With your consent only.</p>	<p>With your consent only.</p> <p>You are not required to provide this information to make an application but it may aid your application if you do.</p>
<p>Detail of whether your parents or spouse is or was a Member of Merchants House.</p>	<p>To allow us to understand your history with Merchants House.</p>	<p>Our legitimate interests.</p>	<p>N/A</p>
<p>Your family history</p>	<p>To understand what family support you have to allow us to consider whether you are suitable for consideration as a beneficiary.</p>	<p>Necessary for the beneficiary contract or for taking steps to enter into the contract.</p>	<p>N/A</p>
<p>Job title / occupation</p>	<p>To understand if you are currently employed and the nature of your employment if you are. To allow us to consider whether you are suitable for consideration as a beneficiary.</p>	<p>Necessary for the beneficiary contract or for taking steps to enter into the contract.</p>	<p>N/A</p>
<p>Your health details (including details of any illness or infirmity you may have)</p> <p>This is special category data.</p>	<p>To understand if you have any health issues which hinders your ability to work. To allow us to consider whether you are suitable for consideration as a beneficiary.</p>	<p>With your consent only.</p>	<p>With your consent only.</p> <p>You are not required to provide this information to make an application but it may aid your application if you do.</p>
<p>Your financial position (including details of your income (including pensions and state benefits), expenditure, capital, and investments).</p> <p>Depending on what type of state benefits you receive we may receive some special category data about you.</p>	<p>To allow us to consider whether you are suitable for consideration as a beneficiary.</p>	<p>Necessary for the beneficiary contract or for taking steps to enter into the contract.</p>	<p>N/A</p>
<p>Bank account details</p>	<p>If you are successful, to allow us to pay the funding to you.</p>	<p>Necessary for the beneficiary contract or for taking steps to enter into the contract.</p>	<p>N/A</p>

Next-of-kin and other family members name, address, and telephone number			
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If you are a beneficiary of one of the Trusts which Merchants House manages (Commercial Travellers of Scotland Benevolent Fund; Inverclyde Bequest Fund) please read this section.

We inherited your personal data from the person / organisation who previously administered the Trust for which you are beneficiary.

If you fail to provide certain information when requested, we may not be able to provide the funding to you.

We apply the following retention periods: we will retain your application for 6 years following the date of your last award

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data
Your name and address	To allow us to pay you as per the terms of the Trust.	Necessary for the beneficiary contract or for taking steps to enter into the contract.	N/A
Your bank account details	To allow us to pay you as per the terms of the Trust.	Necessary for the beneficiary contract or for taking steps to enter into the contract.	N/A

Please do not provide special category data or criminal conviction data unless we request this from you.

4. DONOR SECTION

If you make a donation to Merchants House please read this section.

We collect personal information about you from you when you complete our donation envelopes.

If you fail to provide certain information when requested, we may not be able to comply with our Gift Aid requirements.

We retain your data for seven years in accordance with Gift Aid requirements.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data
Name	For Gift Aid purposes.	This is a legal requirement placed on us.	N/A
Address (including postcode)	For Gift Aid purposes.	This is a legal requirement placed on us.	N/A

Please do not provide special category data or criminal conviction data unless we request this from you.

5. GRANT APPLICANT SECTION

If you apply for a grant with Merchants House on behalf of the registered charity you represent then please read this section.

We collect personal information about you when you complete an application for a grant via our Website or when you correspond with us by email, phone or letter.

If you fail to provide certain information when requested, we may not be able to fully consider your application or we may not be able to perform the contract we have entered into with you (such as providing the funding).

We will not hold your personal information for any longer than is necessary for the uses outlined above, unless we are required to keep your personal data longer to comply with the law and any regulatory requirements.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data Conviction
Your name, email address and telephone number	To contact you individual in relation to the application you are making on behalf of the registered charity you represent.	Necessary for the contract or for taking steps to enter into the contract.	N/A
Your position	To ensure you have sufficient capacity to act on behalf of the registered charity applying for the grant.	Necessary for the contract or for taking steps to enter into the contract.	N/A

Please do not provide special category data or criminal conviction data unless we request this from you.

6. EVENT SECTION

If you sign-up to, or attend, one of our events then please read this section.

We collect personal information about you when you register for an event through Eventbrite or when you correspond with us by email, phone or letter. Ship Venture collects this information on our behalf.

If you fail to provide certain information when requested, we may not be able to issue your event ticket to you or to complete your transaction.

We will not hold your personal information for any longer than is necessary for the uses outlined above, unless we are required to keep your personal data longer to comply with the law and any regulatory requirements.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data Conviction
Your name, email address, and postal address	To allow us to match you to your purchased ticket.	Necessary for the contract or for taking steps to enter into the contract.	N/A
	To contact you if the event details change or for any other purpose connected to the event.	Necessary for the contract or for taking steps to enter into the contract.	N/A
	To send your ticket for the event.	Necessary for the contract or for taking steps to enter	N/A

		into the contract.	
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Please do not provide special category data or criminal conviction data unless we request this from you.

7. VENUE HIRE SECTION

If you hire our venue for functions or events then please read this section.

We collect personal information about you when you complete our online or offline booking form or when you correspond with us by email, phone or letter. Ship Venture collects this information on our behalf.

If you fail to provide certain information when requested, we may not be able to complete your booking or to provide the services to you.

We will not hold your personal information for any longer than is necessary for the uses outlined above, unless we are required to keep your personal data longer to comply with the law and any regulatory requirements.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data
Your name, email address, and telephone number	To allow us to match you to your purchased ticket.	Necessary for the contract or for taking steps to enter into the contract.	N/A
	To contact you if the event details change or for any other purpose connected to the event.	Necessary for the contract or for taking steps to enter into the contract.	N/A
	To send your ticket for the event.	Necessary for the contract or for taking steps to enter into the contract.	N/A
Any information that you provide to us in the 'Message' box or 'additional requests' box of the order form.	<u>Please only provide relevant information.</u> We collect this so that we can assess your requirements for hiring the premises.	Necessary for the contract or for taking steps to enter into the contract.	N/A
To meet your requirements we may require a note of the attendees of your event and details of any dietary requirements. Dietary requirements may reveal details of ethnic origin, political or religious beliefs, or health which are special category data.	To meet your requirements.	We are acting as your processor in this regard.	Please ask the attendees for their consent for their dietary requirements to be passed to us and our caterers.

Please do not provide special category data or criminal conviction data unless we request this from you.

8. WEBSITE SECTION

If you visit our Website and / or contact us through our Website please read this section.

We collect personal information about you when you complete our online Contact form or when you correspond with us by email, phone or letter.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Data Conviction
Your name, email address, and telephone number	To respond to and answer your query.	Our legitimate interests of answering your query.	N/A
Any information that you provide to us in the 'Message' box.	<u>Please only provide relevant information.</u> To respond to and answer your query	Our legitimate interests of answering your query.	N/A

8.1 COOKIES

We also use cookies on our Website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8.2 OTHER WEBSITES

Our Website may contain links to other websites of interest. However, once you have used these links to leave our Website, 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.

9. MARKETING SECTION

If you receive marketing communications or updates from us then please read this section.

If you provide us with a telephone number or postal address we may send you non-electronic forms of communication (post and live calls), based on our legitimate interests. We will only send you digital communications (email and text) with your explicit and prior consent.

You will always have the option to unsubscribe from any of our marketing communications at any time by contacting us at info@mechantshouse.org.uk