

COLLECTIONS DATA PROTECTION POLICY

The <u>European Union (EU) General Data Protection Regulation 2016 (GDPR)</u> came into force on 25 May 2018. This regulation governs the way everyone in the EU looks after information relating to identifiable living individuals (known as 'personal data' under the regulation) and tries to ensure that information is handled with care and respect for the privacy of the individuals it concerns. This policy applies to all aspects of the Army Flying Museum's (AFM) Collections and is intended to inform you about what personal data we retain, the lawful basis for why we hold it, how we process the data and store it, and how you can access and update your data.

The AFM is registered as a Data Controller with the Information Commissioner's Office. Full details of the registration are available at ICO register of data controllers.

There are several ways that people interact with the AFM Collections, including:

- Coming into the Archive to conduct research
- Depositing items with the Museum Collections
- Using the enquiry service
- Taking part in the Museum's Oral History Project

We use your personal data only in connection with the aims, objectives and activities of the AFM as detailed in the following part of the 'Memorandum of Association of the Army Flying Museum':

"The objects for which the Company is established are to advance the education of the public primarily but not exclusively by the provision of a public museum recording and exhibiting all aspects of flying in the British Army both present and past".

1. What type of information does the Army Flying Museum Collections Department collect about you?

- 1.1 We may collect certain personal information which (either on its own or when combined with other information we hold about you) allows us to identify you as an individual.
- 1.2 We may collect or process several different types of personal information from you, depending on which way you interact with us, which may include any or all of your:
 - o Title
 - First name
 - Surname
 - Postal address

- Telephone number
- Email address
- Age
- o Date of birth
- Gender
- Payment information
- o Reason(s) for contacting us, such as enquiries or requests
- Visit history and activities (such as when you visited the Museum, or whether you attended as part of a group)

This list is not exhaustive and may be updated from time to time as our business needs and legal requirements dictate.

- 1.3 We will normally collect personal information directly from you when you volunteer it to us, or when we gather it from your use of our services. We try to limit our use of personal information to the details we need to provide the requested or agreed service for you.
- 1.4 We do not normally collect any Sensitive Personal Information from or about you, and do not wish to do so unless it is absolutely essential. On occasion we may collect Sensitive Personal Information in oral history interviews, where this information may come up during the interview. This would only happen if the Sensitive Personal Information is volunteered or provided by you. If we need Sensitive Personal Information, we will ask you to provide us with necessary details only and we will collect and use this type of information only with your clear consent.
- 1.5 We may store your personal information in electronic and/or hard copy format.

2. How does the Army Flying Museum Collections Department collect your personal information?

- 2.1 This policy applies to any personal information that we collect through our work.
- 2.2 We collect your personal information when you interact with our services, including through email, telephone, letter, or in person visits to the Museum.
- 2.3 The AFM may also collect your personal information from (and/or combine it with information from) other sources, such as:
 - Individuals, and/or organisations where you have confirmed that they may provide your personal data to us.
 - Other sources, such as when information about you is volunteered by a third party e.g., during an oral history recording, or part of a group booking arrangement that a third party facilitates.
- 2.4 On some occasions we may also collect your personal information from public sources where it is fair and lawful to do so. For example, we may use publicly

available information to track down the owner of certain intellectual property rights. These sources may include Google or other internet search engine results, or publicly available data from Facebook, Twitter and similar social media, or other information in the public domain.

2.5 We will only add you to the AFM mailing list with your express consent.

3. Why does the Army Flying Museum Collections Department use your personal information?

- 3.1 The AFM Collections Department may use your personal information for a variety of purposes, depending upon the service you have requested or are using. Quite often we will use your data simply to fulfil a request that you have initiated, such as to deal with your enquiry, give you access to the Collections, to undertake an oral history interview with you, or otherwise to provide you with and enable you to use our services.
- 3.2 The AFM Collections Department may also use your personal information to manage and develop the services that we offer, for example to:
 - Share information with you via our own systems (or third-party collaboration systems used on our behalf)
 - Invite you to provide feedback, assist with surveys and input into consultation exercises
 - Ensure our records are accurate and up to date
- 3.3 In carrying out the above, the AFM Collections Department processes your personal data in a variety of ways, each of which may have a different legal basis. We may process your personal data because:
 - You have given your consent
 - It is necessary for the performance of a contract with you (e.g., the purchasing of services)
 - We are under a legal obligation to do so (e.g., for health & safety purposes)
 - It is in the public interest and in the performance of our duties (e.g., the provision of and access to, and the security of, our Collections as set out in the 'Memorandum of Association of the Museum of Army Flying Limited')

We will inform you of the specific legal basis that applies to the processing of your data either at the point of collection, or in the forms which you sign, and which can be found on this website.

4. Data collected if you contribute to our Collections

4.1 We may collect your contact details, family details relevant to the item or information, and copyright information.

- 4.2 All data retained through your contribution to the Collections will be retained for the life of the Museum.
- 4.3 Our legal basis for collecting data when you contribute to our Collections is that we collect this information so that the Museum can perform its public task, i.e. to collect, preserve and exhibit objects and records relating to the history and traditions of the British Army, and for archiving purposes (this information can be found in the 'Memorandum of Association of the Museum of Army Flying Limited', and in our Mission, Vision and Values).
- 4.4 We use this information to provide provenance, ownership, and copyright details about our Collections, and ensure compliance with copyright regulations for items and images displayed and used by the Museum. For further information regarding copyright, please read our 'Takedown Policy' here: https://armyflying.com/media/dwnnz5e4/takedown-policy.pdf
- 4.5 Personal information is stored in the following ways:
 - Paper records are held in secure storage within the Museum.
 - Digital records are stored in secure storage on a server.

5. How does the Army Flying Museum Collections Department keep your personal information safe?

- 5.1 The Museum takes steps to seek to protect the security of your personal information, in accordance with our legal obligations.
- 5.2 Please note that we cannot guarantee the security of any transmission of personal information over the Internet. Communications sent over the Internet, such as emails, are not secure, although their security may be increased if they have been encrypted. Therefore, please do not submit personal information to us online unless you accept the security risks of doing so.

6. What are your rights in relation to your personal information?

- 6.1 You have several rights in relation to your personal information, although in some cases these rights are subject to certain conditions and limitations. You are entitled to:
 - Request copies of, and/or access to your personal information.
 - Request that your personal information to be corrected where inaccurate or incomplete.
 - Request that your personal data be deleted (or that we stop using your personal data) where it is no longer necessary. This right normally only applies where your information was provided or processed on the basis of consent, or

in the performance of a contract with you which lapsed more than six years ago.

- 6.2 In order to be sure that your personal information is not disclosed to an imposter, we may require you to provide us with proof of identity before any action is taken or personal information is disclosed.
- 6.3 If after receiving a reply from us you are still unhappy with our response to such a request you may complain to the Information Commissioner's Office (ICO). Details on how to do so can be found on the ICO's website.

7. Retaining your personal information

- 7.1 We will keep your details on record until we have completely dealt with your request, enquiry, or our contract with you, and then for a reasonable period afterwards, in accordance with data protection and other applicable legislation, as set out in this policy.
- 7.2 The AFM Collections Department may keep your details on record for as long as is necessary for the purposes for which it was collected. Where this in relation to a specific service you will be informed of the retention period, either at the point of data collection, or in the service specific forms linked to from this page. For contributions to the Collections, please see Section 4. When the AFM Collections Department decides that holding your details is no longer necessary, we will securely delete/destroy your details.
- 7.3 In general, where not related to a specific Service and not included within our collection, we will retain the personal information that you have provided to us for seven years since your last contact with us, for the purposes of audit, analysis and customer management, and the defence of legal claims.

8. Changes to this Data Protection Policy

- 8.1 We may change this policy from time to time to reflect changes in the law and/or our privacy practices. We will update the date at the bottom of this page whenever we do that.
- 8.2 We encourage you to check this policy for changes, for example when you revisit our website.
- 8.3 By submitting your personal information to us, you are indicating that you understand how we use your personal information, as described in this policy.

9. Contact us

If you have questions about this Policy, please contact our Curator at:

Curator
Army Flying Museum
Middle Wallop
Stockbridge
Hampshire
SO20 8FB

curator@armyflying.com

Date of last update:

15 August 2022