



YMDDIRIEDOLAETH ARCHAEOLEGOL CLWYD-POWYS CLWYD-POWYS ARCHAEOLOGICAL TRUST

Privacy Notice

The Clwyd-Powys Archaeological Trust ('we', 'us' or 'our') know that you take the privacy of your information and how it used and shared very seriously, and we will only use your personal information in accordance with the current data protection law in the UK and this privacy policy. This notice describes the Clwyd-Powys Archaeological Trust privacy policy and how we aim to repay the trust you have shown by sharing your personal data with us.

This policy applies to all the websites we operate, our use of emails and text messages, social media, and any other methods we use for collecting information. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.

This privacy policy only applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

We may update this privacy policy from time to time by publishing the amended version on our website. Unless we have legal grounds to do otherwise, we will provide you with at least 30 days' notice of the effective date of the revised privacy policy. We may post the notice on our website and/or send you the notice by email.

Who we are

In this policy, whenever you see the words ('we', 'us' or 'our'), it refers to the Clwyd-Powys Archaeological Trust, of The Offices, Coed y Dinas, Welshpool, Powys, SY21 8RP, United Kingdom. For the purposes of the GDPR, we are a data controller/processor in respect of the personal information that we collect and process about you as described in this privacy policy.

The Clwyd-Powys Archaeological Trust is a registered charity (Charity No 508301) and a limited company (Company No 1212455). We are also a Chartered Institute for Archaeologists Registered Organisation.

Our objective is to 'advance the education of the public in archaeology', and we achieve this with the support of funding from a variety of sources, including Welsh Government. The Clwyd-Powys Archaeological Trust is one of four Welsh Archaeological Trusts working to help protect, record and interpret all aspects of the historic environment for the whole of Wales. This includes the provision of advice to local authorities on archaeology and planning, undertaking

archaeological projects for private- and public-sector clients, and delivering a programme of community archaeology events and activities.

Most of the Clwyd-Powys Archaeological Trust work takes place in the county of Powys and the local authority areas in the former county of Clwyd: namely Denbighshire, Flintshire, Wrexham County Borough and the eastern part of Conwy County Borough. We also work in England and may work elsewhere in the UK and Europe.

The Trust is organised into four departments.

The Historic Environment Advisory Service delivers outcomes in three key areas: maintaining the regional Historic Environment Record (HER); providing Planning Services for local authorities, developers and other bodies; and undertaking Heritage Management work for Welsh Government, local authorities, landowners, developers and others.

The Education and Outreach service enables opportunities for public engagement, participation and social inclusion by providing a wide variety of public events and activities for groups and individuals across the Clwyd-Powys region. This includes events and activities for the general public, as well as work targeted at improving social and economic aspirations and outcomes.

The Field Services team are responsible for the delivery of archaeological projects funded by private- and public-sector bodies, including Welsh Government. Such projects include historic environment characterisation, site assessment surveys and threat-related excavation and survey. This work enhances the knowledge base which supports Heritage decision-making, enables sustainable development across our region, and delivers training and educational outcomes for professionals, non-professionals and the public.

The Administration department maintains a strict control on expenditure, and ensures that the operations of the Trust are conducted in an efficient manner.

Governance of the Trust is through a Board of Trustees, which meets four times per year. As an independent Charitable Trust we submit publicly-accessible annual accounts to the Charities Commission, and as a limited company we file returns to Companies House.

We may collect and process the following data about you:

Personal information, such as name, postal address, phone number, email address, that you provide by filling in paper forms or on our web site www.cpat.org.uk, or when you contact us via telephone, email or post and includes information provided when you:

- enquire about our services;
- enquire about a specific product;
- request a call back

- subscribe to receive one of our e-communications;
- become a Friend, Volunteer, Member or Trustee;
- submit a question to us or provide us with feedback.

What is Personal Information?

Under the EU's General Data Protection Regulation, Personal Data is defined as: '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'.

How we use the information we collect

We may process your personal data for our legitimate business interests. "Legitimate Interests" means the interests of our company in conducting and managing our business and providing you with the best services and products in the most secure way. These interests include:

- To provide you with information about our products, services, events and activities that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes;
- To help us identify you when you contact or visit us.
- When you communicate with us (e.g., by emails, phone calls, tweets, etc.), we may retain such information and our responses to you.

When we process your personal data for our legitimate business interests we always ensure that we consider and balance any potential impact on you and your rights under data protection laws. If you have any concerns about the processing described above, you have the right to object to this processing. For more information on your rights please see "Your Right" section below.

Choice/opt-in and opt-out

Whenever the processing of your personal data requires your consent then you will be given the opportunity to opt-in or opt-out to having your contact details used as set out above, at the time your details are submitted.

For example, when you decide to become a Friend of the Trust or Volunteer at an event, you can tell Us when you provide your details if you do not want to receive any other information from the Clwyd Powys Archaeological Trust or our strategic partners, or you can let us know how best to get in touch with you with information that may be of interest.

If you do not wish us to use your data as set out above, or to pass your details on to third parties for accreditation or certification purposes, please leave the relevant boxes, situated on the form which we used to collect your data, blank/unticked.

If you no longer wish to receive email or other materials from us, you may opt-out of receiving these communications at any time by one of the following methods:

- by replying to the email with 'unsubscribe' in the subject line;
- by using the opt out boxes on the response form and submitting it;
- by writing to The Data Controller, Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool, Powys, SY21 8RP;
- by calling us on 01938 553670.

Please be aware that if you opt out of receiving communications from us you may miss out on important information regarding events and activities carried out by the Clwyd-Powys Archaeological Trust. The range of services offered by the Clwyd-Powys Archaeological Trust or selected business partners include, but is not limited to:

- Commercial archaeology services
- Heritage interpretation
- Volunteering opportunities
- Events
- Talks

Sharing your information

We may disclose your personal information to third parties, if we are under a duty to disclose or share your personal data for legal or regulatory purposes, in relation to existing or future legal proceedings, for the prevention of fraud/loss or to protect the rights, property, safety of the Clwyd-Powys Archaeological Trust, our customers or others.

Data security

Information is stored by us on infrastructure located in the UK/EU/US. We may also store information in paper files. The Clwyd-Powys Archaeological Trust have security protocols and policies in place to manage and record your data privacy and preferences correctly and ensure that your data is stored securely to protect against its loss, misuse and alteration. Documentation can be supplied on request from our Data Protection Officer via email (dpo@cpat.org.uk) or can be viewed here on our website privacy page.

The Clwyd-Powys Archaeological Trust take steps to ensure that any businesses that we share your data with will have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored correctly.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information, we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

We will keep your information only for as long as we need it to provide you with the goods, services or information you have required, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need information, we will always dispose of it securely, using specialist companies if necessary to do this work for us.

Job applicants, current and former Clwyd-Powys Archaeological Trust employees

When individuals apply to work at the Clwyd-Powys Archaeological Trust, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Barring Services we will not do so without informing you beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be destroyed or deleted after 6 months.

Once a person has taken up employment with the Clwyd-Powys Archaeological Trust, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with the Clwyd-Powys Archaeological Trust has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Your rights

Under the data protection legislation, you have the right to request copies of your data, request rectification of your data, request erasure of your data, object to us processing your data, the right to prevent your data being used for direct marketing, request us to restrict the process and where our systems allow, the right to access a copy of the information We hold about you (a subject access request).

If you wish to exercise any of these rights please contact the Data Protection Officer in writing at Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool, Powys, SY21 8RP, United Kingdom, or by emailing dpo@cpat.org.uk

For more information about your rights under the Data Protection Act contact the Information Commissioner's Office www.ico.org