



## CASTLE HOWARD

### 'Capturing the Castle' Donation Policy

This Donation policy aims to give you ('the Donor') information about how Castle Howard Estate Ltd (referred to as 'we'/'us'/'our' in this policy), collects and processes your personal information when you participate in our 'Capturing the Castle' project.

For information about how we use other personal information which you share with us, please visit our [privacy policy](#).

Castle Howard Estate Ltd is the data controller and responsible for your personal information. If you have any questions about the contents or application of this policy, please send your queries to our data privacy manager, Mr M. Gaynor ([mgaynor@castlehoward.co.uk](mailto:mgaynor@castlehoward.co.uk)/ 01653 648444).

#### **What is the 'Capturing the Castle' project?**

As part of a new photo exhibition project that will become known as 'Capturing the Castle', we will be asking members of the public to donate photographs, and other material that charts the History of Castle Howard as a visitor attraction. This will be done using items and images from our own collection but also through the eyes of our visitors using photographs and material from private ownership.

#### **What material should I donate and what information will you collect?**

Donations will be gratefully accepted in many forms that include photographs, memorabilia and written testimony. We ask that you contact us with information about your donation as a first step. When you contact us by telephone or email, we will request details of your donation. We will also ask for your identity and contact details (collectively called 'Personal Information' in this policy), together with your consent to us using such Personal Information.

The Personal Information we will collect about you will include: Forename, surname, email address and telephone number.

We will only use your Personal Information when you have consented to sharing it with us, so that we can record your donation, to categorise the date and origin of the material you donate, and to get in touch with you if we have any queries. No Personal Information will be displayed as part of the project.

All Personal Information which you share with us will be stored and used in accordance with the General Data Protection Regulation 2018 (GDPR), the Data Protection Act 2018 (DPA) and in accordance with our privacy policy.

## **Images**

If your donation captures individuals (for example, it is a photograph or video), it may constitute personal data if the individual in the photograph or video can be identified from it. The same applies to written testimonials, if an individual can be identified from it.

Within this policy, we have categorised the types of images which a Donor may submit, to explain where they may, or may not be, considered personal data.

- Images of individuals or small groups

If your donation includes an image of a single individual, who can be readily identified from the image, it is likely to be classed as personal data. Upon submission of the donation, you will be asked to confirm that you have obtained the consent of the individual in the image before submission. Consent can be withdrawn at any time by contacting the data privacy manager (details above).

If the individual is in the background of the image, and cannot be identified from it, or the individual is now deceased, the submission will not be personal data and no confirmation of consent will be required.

- Images of crowds or large groups

Where the image is of a crowd and does not focus on one particular individual or group of individuals, or individuals have been incidentally captured in the background of an image, it is very unlikely that the image will be personal data and the GDPR/DPA will not apply.

If individuals within the crowd or group can be identified, it is likely the image will constitute personal data. We will rely on our legitimate interests to process and store this type of image, in conducting, developing and managing the project (keeping it up to date), and to enable us to give the viewer the best experience.

We make sure we consider and balance any potential impact on the subject's rights before we process the personal data for our legitimate interests. We will not use any personal data for activities where our interests are overridden by the impact on the Donor or the subject, (unless we have the Donor's or the subject's consent or as otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you as Donor, or the subject, in respect of specific activities by contacting us.

Even though in most cases this category of images will not be personal data, it is our policy to respect the preferences of individuals who may request that donations are not displayed once they have been submitted, or if they are requested to be removed at a later date. If you are captured in an image which has been displayed, and you would like it to be removed, please contact our data privacy manager, Mr M. Gaynor ([mgaynor@castlehoward.co.uk](mailto:mgaynor@castlehoward.co.uk)/ 01653 648444).

### **How can I donate Material?**

You can donate material in the form of digitised or scanned photographs/video material (upload instruction or email address). You can also send us physical photos or memorabilia via post (postal address).

When you donate, you choose to share your Personal Information with us (as defined above), so that we can use your donation as part of our project and keep a record of you as the Donor. You are asked for your consent to enable us to use and store your Personal Information. You can withdraw your consent at any time by contacting emailing [marketing@castlehoward.co.uk](mailto:marketing@castlehoward.co.uk).

We can accept anonymous donations, where you do not share any of your Personal Information with us, but we may not be able to affiliate your donation with you as its Donor.

### **Who is collecting/using the material?**

All material donated will be handled by our Curatorial Department. It will then be used by the Curators in conjunction with our Marketing Team throughout the development and conception of the exhibition. Details of your donation and your Personal Information will not be shared with any other third party for any purpose.

### **Why is it being collected?**

Material is being collected to better show how Castle Howard has been enjoyed by the public throughout its more recent history. We will then use material donated to build an ongoing exhibition for display to the public.

### **How will it be used?**

We may use material you donate as part of physical exhibits on site at Castle Howard, digitally via our website or social media channels (Facebook, Twitter, Instagram, and LinkedIn) or in print in the future. It will not be used for any other purpose.

### **What am I accepting by donating material?**

By donating to us, you consent to us using your donation as part of our 'Capturing the Castle' project.

You also consent to Castle Howard publishing material by means listed above, whilst ever the project is active.

In regard to donated images/videos, you accept that you have obtained the consent of the individuals who can be readily identifiable from such images/videos. Such individuals are fully aware that the images or videos will be published as part of the exhibit or in material associated with the exhibit.

### **What will happen to material I donate when it is not being used?**

Your Personal Information will be stored and kept in accordance with our privacy policy.

Material you donate will be stored and kept as part of the Castle Howard collection & archive, this will either be in a digital or physical archive. Donated material would then be absorbed into the Castle Howard Collection for archiving and historical research purposes. You can request details of how long we will store your donation by contacting us.

We have put in place appropriate security measures to prevent your donation, or Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. If you would like your donation to be returned, please do stipulate this when making your enquiry.

We will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. To find out more, please visit our privacy policy.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

To find out more, including information about the rights and how to exercise them, please visit our Privacy Policy. If you wish to exercise any of the rights set out above, please contact our data privacy manager.

### **Change of purpose**

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We keep this policy under regular review. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during the course of our project.