

PRIVACY POLICY



INTRODUCTION

The Royal Drawing School is committed to protecting the personal information that you share with us. We want to maintain the trust that our students, visitors and supporters have in the School, especially when using our website or being contacted by us directly.

The information that you share with us enables you to decide how you would like to hear from us, tailoring the information that you receive. It also helps us to get a better understanding of the School's audience so we can continue to deliver, develop and evaluate the courses, events, exhibitions and opportunities that interest you.

Our privacy policy provides a detailed account of the personal information that we collect, how we collect it, why we collect it and how we use it. It also details how we keep your information secure. We may update this policy from time to time, without notice to you, and our most up to date version will be available on our website.

By providing us with personal information, you consent to the collection and use of this information in accordance with this privacy policy. We will not keep your personal data for longer than is necessary.

UK GDPR

The UK GDPR (UK General Data Protection Regulation) is a regulation which enhances and strengthens data protection within the United Kingdom. The Royal Drawing School is legally obliged to comply with the provisions of Data Protection Act 1998 and has made changes and updated our policies to ensure we are compliant with the UK GDPR.

DATA PROTECTION PRINCIPLES

The Royal Drawing School will comply with data protection law, which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes

4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

WHAT OUR POLICY COVERS

- The personal information that we collect and how we collect it
- Why we collect this information and how we use it
- How we keep this information secure
- How you can remove your personal information from our records
- Rights to access personal information
- Your Data Protection Rights
- How to contact us
- Further information on data protection

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

The Royal Drawing School generally collects your information when you decide to interact with us. This could be through booking a public course or open day, applying to courses such as The Drawing Year or for scholarships, attending one of our events or an external event run by the School or signing up to our e-newsletter.

Information is largely collected through our website but it might also be over the phone, in person or via email. The School also monitors how our audience interacts with our website so that we can make sure it is functioning in a way that works best when you are booking a course or simply looking for information.

We might collect information when you:

- Visit our website (see cookie policy)
- Book a course or event
- Attend one of our full-time courses
- Sign up to our e-newsletter
- Apply to a course or residency
- Apply for a scholarship or bursary
- Attend an external event run by the School
- Buy an artwork
- Make a donation to the School

In collecting personal information from you, our aim is to contribute to the smooth running and development of the School, and to let you know about things that might be of interest to you.

Depending on the nature of your relationship with the School, we collect and process the following examples of personal information, although we may, at times, also need to collect other personal information that is not listed here:

- Basic information (e.g. your name, date of birth)
- Contact information (e.g. address, telephone number, email address)
- Sensitive information (e.g. ethnicity, gender, medical information, passport details, tax credit information, bank details, art work purchases)
- Education information (e.g. the institutions you have previously studied in, courses you have taken, your level of education, student report cards and assessments)
- Publicly available images: we may use publicly sourced images to help identify individuals who attend our special events
- Publicly available information such as biographies, articles or employment history
- Artworks (e.g. photography copyright and reproduction rights)

Legitimate Interest

We carefully consider whether there is a legitimate interest in the affairs of the School, before making direct contact. We will always ensure that we use data proportionally, with a minimal impact on personal privacy.

WHY WE COLLECT THIS INFORMATION AND HOW WE USE IT

The Royal Drawing School collects information from you to guarantee we continue to provide a service that maintains the high level of efficiency and personal communication that our students and supporters expect. We will only use your personal information when the law allows us to. We might use your information in the following ways:

- To carry out administrative functions (e.g. completing application forms, booking courses, taking payments)
- To send you information that we think might be of interest to you
- To invite you to events
- To comply with our legal and regulatory obligations, including health & safety and safeguarding
- To fulfil a legitimate interest pursued by us and your interests and fundamental rights do not override those interests
- To improve our services
- To handle complaints
- To monitor student progress
- To conduct investigations and due diligence

- To approach potential supporters*
- To undertake research
- To further our charitable mission
- To provide you with the services, products or information you engage with us for.
- To process orders that you have submitted (such as course bookings and art sales)
- To administer course admissions, selection and interviews
- To carry out our obligations under any contracts entered into between you and us,
- keeping a record of your relationship with us
- To administer your donation or support your fundraising, including processing Gift Aid
- To respond to or fulfil any requests, complaints or queries you make to us
- To conduct analysis and market research to better understand how we can improve our services, products or information
- To analyse the number and type of people who have used the School's services to demonstrate our impact and apply for funding
- To monitor the interactions we have with our customers, donors and beneficiaries for quality control and compliance purposes to ensure we are delivering the service we and our regulators expect.
- To monitor website-use to identify visitor location, guard against disruptive use, monitor website traffic, personalise information which is presented to you
- To deal with entries into any competitions we might run, such as school art competitions.
- To seek your views or comments on the services we provide
- To notify you of changes to our services
- To administer a legacy, where the charity is potentially the beneficiary of a legacy, we will obtain the names and contact details of executors, a copy of the will, and a grant of probate
- To check donations for the purposes of prevention of fraud or other crime
- To process course concessions, grants, bursaries or job applications (where we may ask you to provide details of your financial situation and bank details; proof of benefits (such as universal credit, PIPs, and free school meals); proof of employment if you are a teacher).
- To protect your interests (or someone else's interests) where necessary
- To share in relation to a public interest need or official purpose

** We may carry out analysis of the personal information of a small number of individuals who we think might be interested in supporting the School. This may be via Royal Drawing School course bookings, art purchases, third party recommendations or publicly available resources. To this information we may add publicly available information relating to: residential location, wealth and assets, career, donations to other organisations, hobbies and interests. This helps us to create a profile of your preferences and your ability and capacity to support us. We can then contact you in the most appropriate way, and with the most relevant information.*

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin or [sexual orientation], require higher levels of protection. The Royal Drawing School may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with your relationship with us.
- Where it is needed in the public interest, such as for equal opportunities monitoring.
- Where it is necessary to protect you or another person from harm.

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information are listed below.

The Royal Drawing School will use information about your physical or mental health, or disability status, to:

- Ensure your health and safety at the School;
- Provide appropriate reasonable adjustments;
- Monitor and manage sickness absence

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

We do not need your consent where the purpose of the processing is to protect you or another person from harm or to protect your well-being and if we reasonably believe that you need care and support, are at risk of harm and are unable to protect yourself.

Website

When you visit our website we collect an automatically generated IP (Internet Protocol) address. This is a code individual to the device being used which contains information about the geographical location of the device, the time and date of the visit, the pages of the website that were visited and the duration of the visit. This information is pseudonymised to protect your personal information and your privacy.

Google Analytics

Your IP address and information about your behaviour on our website are collected and processed anonymously by Google Analytics in a way that means it is impossible for you to be identified as an individual. Analytics also uses cookies to provide us with information about the make-up of our website's audience and allows us to competently manage the site, updating it according to the way in which our audience interact with it. This data is shared between the Royal Drawing School and Google Analytics, in a secure system. We may share Analytics data with other parties or tools, such as Google AdWords or Hot Jar if website users have consented to Analytics Cookies using the website consent pop-up.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. Google Analytics is a non-invasive form of third party cookie. Retargeting cookies are used on our website so visitors to www.royaldrawingschool.org who have consented to their use, may see Royal Drawing School advertising on other websites. When you log on to the website for the first time, you will be given the option to choose from Necessary, Analytics and Advertising cookies.

We may also use cookies from social media networks such as Meta, X, Tik Tok and others. To find out how cookies work on these platforms, please visit their websites. For Meta (Facebook and Instagram) please visit their [website here](#). We collect anonymised data on people who have opted into Advertising Cookies on our site to retarget through Meta advertising.

You can set your browser not to accept cookies, the website below give more information on how to do this. However in a few cases some of our website features may not function as a result. For further information visit: www.aboutcookies.org or www.allaboutcookies.org.

Third Party Organisations

The Royal Drawing School may pass your information to a third-party service providers, suppliers, agents, and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example, to process bookings and to deliver our education online). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. We will never sell or rent your personal data to third parties.

We may also share data with Google, Meta, Tik Tok, Pinterest and other third parties to help us identify customers who are similar to our audiences, target the adverts that we serve, and ensure they are relevant to new and existing customers. However, we will only do so if we are satisfied that your personal data is secure and will not be used for any other purpose. The personal data shared for these purposes is pseudonymised to protect it.

We may pass your information to a third party where it is reasonably necessary to achieve our legitimate interests (as long as what the information is used for is fair and does not duly impact your rights. We consider our legitimate interests to be:

- Send postal communications which we think will be of interest to you.
- Conduct research to better understand our students and to improve the School's offer as a charity and an education provider.
- Understand how people use our services and courses.
- Determine the effectiveness of our services, courses, promotional campaigns and advertising.
- Monitor who we deal with to protect the School against fraud, money laundering and other risks.
- Enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers; and
- Better understand how people interact with our website.

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions. Where your data is shared with third parties, we will seek to share the minimum amount necessary.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.

Where we transfer your data outside the UK, we will ensure that: the country where the data is transferred to is within the European Economic Area (EEA); or the country has been deemed to provide an adequate level of protection for personal data by the European Commission; or we use specific contracts approved by the European Commission which give

personal data the same protection it has in Europe, combined with appropriate due diligence; or a specific legal exception applies.

However, to ensure that your personal information does receive an adequate level of protection, we have put in place the appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection.

E-Newsletters and Mailings

The Royal Drawing School would like to send you information about courses, events, exhibitions and opportunities which may be of interest to you. You can either sign up to our e-newsletters via our website or, if you have requested to be, you will be added to our mailing list when booking a course, event or open day via our website.

If you have consented to receive marketing information, there is always the opportunity to unsubscribe at the bottom of every e-newsletter.

You also have the right to stop us from contacting you via the post. If you no longer wish to be contacted for marketing purposes in our mailings, please email admin@royaldrawingschool.org to let us know and we will remove your information from our lists.

Social Media

If your social media settings on platforms such as Meta, Tiktok and X allow, we may have permission to use information which you have shared on such sites (e.g. your location and interests) to advertise the School's activities to you. This information is pseudonymised and the School has no direct access to your personal information from these sites.

Photography & Filming

We regularly photograph the School's activities to use for marketing and fundraising purposes – images provide a great way of giving the public and our supporters a better understanding of what we do. The School requires verbal and written consent from students taking part in all courses before a session is photographed. We may also ask for consent in the form of student contracts or release forms. Most of our public events are photographed professionally and by attending the event you agree to be photographed.

The School might use images for the following hard copy and digital marketing purposes:

- Brochures
- Leaflets
- Posters
- Books or publications
- Website
- Online advertising
- Printed advertising
- Social media
- Outdoor advertising

Should you wish for a photograph of yourself to be removed from our online platforms (for example our website or social media) please email admin@royaldrawingschool.org and include the location in which we can find the image. Please note that any print material cannot be revoked once published (where consent was previously given).

Data Retention

We regularly review the personal data that we hold, and proactively remove data when we think that there is no longer a legitimate interest in the School's affairs. We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting 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
- The applicable legal requirements

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice to you.

HOW WE KEEP YOUR INFORMATION SECURE

The Royal Drawing School adopts robust processes, appropriate technologies and policies so that the information we have about you is protected from unauthorized access or improper use. Our online forms are always encrypted and our network is protected and monitored. Within our offices our staff receive training on handling data securely.

Your personal information is held securely within our password protected internal IT systems. We use programmes including:

- Booking Live – [privacy policy](#)
- Mailchimp – [privacy policy](#)
- Jotforms – [privacy policy](#)
- Cloud Direct – [privacy policy](#)
- Microsoft Office 365 – [privacy policy](#)
- Eventbrite – [privacy policy](#)
- Zoom – [privacy policy](#)
- SignIn – [privacy policy](#)
- Bearbox – [privacy policy](#)
- Gamma – [privacy policy](#)
- Salesforce – [privacy policy](#)

We also hold information on Royal Drawing School servers located in our Shoreditch Headquarters and on The Cloud which are protected by high levels of data security.

Whilst we will strive to ensure the protection of your information through all means available to us, no data transmission over the internet is guaranteed to be completely secure and all systems can be the target of hacking and cyber breaches.

YOUR DATA PROTECTION RIGHTS

Rights to access information

You have the right to access the information that we hold about you. If you would like to request a copy you will be required to complete a Subject Access Request Form.

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

The Royal Drawing School aims to comply with the requests for access to personal information as quickly as possible, and will ensure it is provided without undue delay and in any event within one month of receipt of the request, other than in exceptional circumstances, unless exceptions apply. For example, if the request is considered complex or if there has been a significant number of requests, the Royal Drawing School may extend the timeframe to respond by a further two months. In such cases, the reason for any delay will be explained in writing to the person making the request.

Request correction

You have the right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure

This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing.

Object to processing

You have a right to object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing

You have a right to request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer

You have the right to request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us via the details below in writing.

CONTACT US

If you have any queries about this Policy you can contact us in the following ways:

Email: harry.parker@royaldrawingschool.org

Telephone: 0207 613 8568

Post: 19 – 22 Charlotte Road, London EC2A 3SG

Further information

To find out more about UK GDPR and data protection laws, please visit the Information Commissioner's Office at ico.org.uk

Disclaimer

Although every effort has been made to ensure the information in this policy is accurate at the time of publication, the Royal Drawing School does not accept any liability for error or omission.