

PRIVACY NOTICE

This privacy notice tells you what to expect when Royal Collection Trust¹ (RCT) collects personal information. It applies to information we collect about:

- People who purchase tickets from us
- People who supply feedback
- People we photograph
- People who have an accident
- People captured on CCTV
- People who purchase our merchandise
- People who subscribe to be contacted by us
- People who enter our competitions
- People who access our free guest WiFi service
- People who e-mail us via the retail help desk
- People who browse our websites
- People who contact us via RCT websites
- People who make enquiries about the Royal Collection
- People who request permission to photograph objects for research purposes
- People who request photographic prints or digital files
- People associated with objects in the Royal Collection
- People invited to attend RCT events
- People who make donations
- Journalists who contact the Press Office
- Lost property

Your privacy is extremely important to us. Any personal information we gather from you will be used in accordance with the Data Protection Act 2018 and in accordance with the policy of the Royal Household.

¹ Royal Collection Trust incorporates a registered charity and its trading company, Royal Collection Enterprises Ltd.

1 THE INFORMATION WE COLLECT

1.1 People who purchase tickets from us

When people purchase tickets from us, we may collect their name and contact details. This personal data is retained for six financial years in line with HMRC requirements on the retention of financial records. Any purchase of tickets in advance of the visit date will require the collection of their name, e-mail address, postcode, house number, country, and telephone number. We will use the customer's e-mail address to confirm the booking, and to send them information about their visit. We may also use the customer's email address to deliver their electronic tickets and receipt if they have chosen to receive e-tickets. We will use the customer's postal address to deliver their tickets to them if they choose to pay to have their tickets delivered by post, as a proof of purchase validation question on collecting tickets, or to process a Gift Aid declaration as applicable as in 1.18.2.

Where food and drink is offered during the visit, we may collect information about dietary requirements such as allergens. Where visits require step-free access, we may collect vehicle details (registration, make, model, colour, registered owner). For school visits where there are students with special needs, we may be provided with their requirements (students are not identified by name). This information is held according to RCT's retention schedule for six financial years.

If customers wish to use features that require them to register with us, we ask them to create an online account. To do this they need to input some of their personal information on our web registration form. We ask for their name, e-mail address, postcode, country, telephone number, interests and a password ("Personal Information").

When customers create an account they will be asked if they want to receive regular e-mail updates about latest news, exclusive events and competitions.

1.2 People who supply feedback

People who visit one of our sites or attend one of our events may be asked to provide feedback. This may include a request for such personal details as postcode and age range. We ask for these details in order to build a background profile of the range of people taking part in particular learning events. We collect this data in a way which ensures it does not personally identify you.

1.3 People we photograph

On occasions, there may be a photographer engaged by RCT at an event or exhibition (including the Buckingham Palace Summer Opening). We may ask people to sign a model release form to confirm their consent to being photographed. If we wish to take photographs of children at an event, we will obtain consent from their parents or

guardians before doing so. Often schools assist us in obtaining that consent. We keep consent forms indefinitely as proof of consent. If there is a large group of children at a family event, such as a Festival Day, we may ask that children who do not wish to be photographed wear a sticker so that we do not include them in any photographs. We use these photographs to promote our RCT activities.

1.4 People who have an accident

If a person has an accident whilst visiting one of our sites, we may ask them to complete an Accident Form on which we ask for their name, contact details, and the nature of their injury. We are obliged to do this under Health and Safety Regulations. Depending on the nature of the accident, we may also have to report it to government regulators. We will retain their personal information securely in locked facilities for six years in order to comply with relevant legislation.

1.5 People captured on CCTV

There are CCTV cameras around the Royal Residences, galleries and shops which have been installed for the purpose of the prevention and detection of crime. These may collect images of members the general public. The Data Controller for the footage of the CCTV camera is the Keeper of the Privy Purse. The footage may be shared with the police when they are investigating an incident. The footage is kept securely and access to the images is strictly limited. The footage is normally retained for 30 days and then recorded over.

1.6 People who purchase our merchandise

When people purchase goods via our website or over the telephone using our home delivery service, we will ask them to provide their name, e-mail address, telephone number, billing address and delivery address. We do this in order to process their order and to maintain a record of correspondence.

We retain this information for six financial years in line with HMRC requirements on the retention of financial records and whilst the customer continues to use our service.

1.7 People who subscribe to be contacted by us

1.7.1 People who receive our e-mail updates on exhibitions and events

We send e-mails out several times a month to subscribers to our e-mail updates on the topics they wish to hear about, depending on each subscriber's stated preferences. Subscribers can edit their preferences or unsubscribe from the links in the footer of every e-mail.

Subscribers who have not clicked on any e-mail communications from us for 15 months will no longer receive our e-mails updates.

Unsubscribed data is kept securely in our e-mail system in order to ensure we have a record of people who do not wish to be contacted. If a user wants their data to be deleted, their record can be deleted from the e-mail system upon request.

1.7.2 People who receive our group mailings

We offer people who represent groups, and the travel trade, regular updates which include new exhibitions, site news, and an up to date opening and closures list. These updates are e-mailed from time to time to people who have made a group booking with us previously and have provided us with their contact details for this purpose, and/or have indicated to us that they wish to receive this material. In order to do this, we collect these people's names and e-mail addresses. They can unsubscribe from these e-mail updates at any time by clicking on "unsubscribe" or "update my preferences" at the bottom of any e-mail they receive from us.

We also collect the personal information of individuals who make group bookings with us, or who request to be added to our group mailing list, in order to post them a copy of our annually updated Group Visits and Private Tours Brochure. For this purpose, we process their names and addresses, and the group with which they are affiliated. These individuals may request their details be deleted from our group mailing list at any time by contacting the Trade Sales and Marketing team at RCT by telephone, e-mail or post.

RCT relies on the legitimate interest basis for consent to process the personal data of people who receive our group mailings.

1.7.3 People who receive regular updates on merchandise

We offer people regular updates on merchandise available through our retail outlets. If people wish to receive this, we ask them to give us their e-mail address. People can unsubscribe from these e-mail updates at any time by clicking on "unsubscribe" at the bottom of any e-mail they receive.

1.7.4 People who complete 'stay-in-touch cards'

In each retail outlet, we have a newsletter registration form which enables customers to subscribe to our merchandise mailing list. We ask for the customer's name (optional) and e-mail address, which is collected and entered into our secure e-mail system. The registration forms are subsequently securely shredded.

1.8 People who enter our competitions

When people enter any of our contests or prize draws, we collect their name and e-mail address. If people win, we will notify them by e-mail and ask for their postal address. On an ad hoc basis, we may also receive personal information on new subscribers who have opted in to receive our e-mail updates via a competition entry with a third party.

1.9 People who access our free guest WiFi service

At selected sites, we offer free guest WiFi. On the registration page, users will need to enter their name, e-mail address and country of residency to join the network. We collect this information to personalise their online experience and to allow them to reconnect easily if they visit one of our other sites. Users may also choose to subscribe to our merchandise and newsletter mailing lists, via the opt-in checkboxes.

1.10 People who e-mail us via the retail help desk

We use an external provider to process the enquiries made via the customer account. This feature is only available to logged-in customers. No additional personal data is required; customers just need to enter a subject line and message.

1.11 People who browse our websites

When people browse RCT websites (rct.uk) or our retail website (royalcollectionshop.co.uk), we use first-party cookies (cookies that we have set, and which can only be read by our website) to keep track of their current session and to personalise their online experience. We also use third-party cookies (cookies that are set by an organisation other than the owner of the website) for the purposes of website measurement and targeted advertising. People can control the use of cookies by adjusting their browser settings, ads settings, ad settings for mobile apps, or any other available means. People may experience technical difficulties in using our websites if they have disabled cookies. Further information on cookies and the cookies used on our websites can be found on the following two webpages: www.rct.uk/cookies and www.royalcollectionshop.co.uk/privacy-and-security.

We may also collect information about where people are on the internet (e.g. the URL they came from, IP addresses, domain types like .co.uk and .com), their browser type, the country and telephone area code where their computer is located, the pages of our website that were viewed during their visit, the advertisements they clicked on, and any search terms that they entered on our website ("User Information"). We may collect this information even if they do not register with us.

We collect this information for statistical or survey purposes to improve our websites and their services to our users and to recognise users when they return to our

website; to serve website content and advertisements to users; to administer our websites and to notify users about changes to our services; and for the detection of fraud.

Personal information collected from users' browsing activities is kept for two years.

1.12 People who contact us via RCT websites

When people complete a contact form on one of our websites we ask them for their name and e-mail address as well as other information particular to the nature of their enquiry; we will also capture their IP address. The data we collect is retained in accordance with RCT's and the Royal Household's retention schedules.

1.13 People who make enquiries about the Royal Collection

People who come on site to do research on the Collection may be requested to provide the following personal details: name, address, and whether or not they have a criminal record. We collect this personal information as part of our security procedures. This is done in order to keep people safe and the premises and the Collection secure.

From time to time, people may write to us about objects in the Royal Collection. We may keep their name and address or e-mail address on file together with their enquiry and our response should there be any follow up correspondence.

1.14 People who request permission to photograph objects for research purposes

People may request to undertake photography of an object or works in the Royal Collection for research purposes. In order to process this request, we ask them to provide their name, e-mail address and postal address on a Copyright Assignment Form which they must also sign. These forms are retained indefinitely in a secure manner. The purpose for processing and retaining this personal information is in order to protect the copyright of RCT material.

1.15 People who request photographic prints or digital files

People may request photographic prints for personal use or for research, or digital files for reproduction purposes of objects in the Royal Collection. In order to provide this service, we request their name, e-mail, postal address and payment details and use these details to process the order. Secure methods of payment are used to complete transactions.

Details are held indefinitely, but not shared with any third parties. Nor are the details used for promotional or any other activities except for processing, completion and delivery of the order.

1.16 People associated with objects in the Royal Collection

As part of maintaining a record of the history of the objects in the Royal Collection, we record personal information about those responsible for the production of, and those associated with the acquisition, of works. For this purpose, where relevant we may record on our database such personal details as their name, address, e-mail address, and their association with the object, and we keep that information indefinitely. We do not share their personal information outside the Royal Household unless consent has been provided.

1.17 People invited to attend RCT events

From time to time RCT hosts special events, such as exhibition openings or publication launches, at Royal residences. When RCT invites people to these events, it processes names and addresses (residential or business) in order to send out invitations. These are obtained from people who are already associated with RCT or from public sources.

We may share this information with our external printers who prepare the invitations. We may also prepare a short biography about our guests, sometimes including a photograph. This information has either been provided to us by the relevant guest or comes from public sources. We do this in order to facilitate our engagement with our guests at the events. When a person accepts an invitation, we retain a record of the event they have attended and their contact details on our events database, which is securely stored on our internal network.

1.18 People who make donations

1.18.1 Charitable donations

When people support us, for example by making a donation to a specific project, we will usually collect their name and contact details. We collect this data so that we can update people on how their donation has been used. We may ask for more support through donations. Names of donors may be published in RCT's annual report, with their permission. If you have donated to us, we are required to keep this data for six financial years.

1.18.2 Gift Aid donations

When people make a Gift Aid donation, we may collect the following information: title, forename, surname, postal address and information regarding their eligibility to make a Gift Aid donation. This personal data is retained for six financial years.

1.19 Journalists who contact the Press Office

The RCT Press Office accesses and uses contact details for journalists who register on Gorkana, a third party media database. We also process the personal details of journalists who contact us directly for information. In this case, their personal information is added to RCT's mailing list held on our secure network.

The RCT Press Office uses these contact details in order to send journalists press information, invitations to events, and to respond to enquiries. These details may include name, telephone numbers, addresses, and e-mail addresses. We may share journalists' names and addresses with a third party mailing house for RCT purposes only. They are not passed on to any other external body.

Journalists may unsubscribe from RCT mailing lists at any time by contacting the RCT Press Office by telephone, e-mail or post. Journalists' contact details remain on our mailing list indefinitely unless we become aware or are advised of a change of address or e-mail, or someone unsubscribes. We actively manage our mailing lists to keep them up to date.

Journalists who wish to apply to visit RCT premises, can apply by completing our "Press visits" online form available on RCT website. This form requests the following personal data be provided by the applicant: name, e-mail, telephone, name of media outlet, position. We collect these details in order to assess and process the application. The personal data provided on this form is gathered by a third party provider and stored securely. It is released to RCT for processing. The personal information is retained according to RCT's retention schedule.

1.20 Lost property

If we find lost property on our premises, your goods may be examined in order to find your contact details and, if found, to contact you to arrange for collection. If you contact us about your lost property, we may take your contact details (name, address, telephone number, e-mail address) so that we can communicate with you should the item be found.

2 SHARING YOUR PERSONAL INFORMATION

We work with a number of technology partners to maintain and improve our services to you.

Aside from our technology partners and when required government regulators, your personal information will not be disclosed to other businesses or third parties outside the Royal Household except where specific data sharing agreements are in place; these may include purchases where RCT is acting as an agent on behalf of a third party, such as when people purchase tickets to visit The Royal Gardens at Highgrove either through RCT's online ticketing site www.highgrove-tickets.com or through RCT's Contact Centre which processes telephone bookings.

In limited circumstances, we may be required to disclose certain details to the Metropolitan Police Service and the respective county constabularies to ensure the security of our premises.

3 HOW WE PROTECT YOUR PERSONAL DATA

When people purchase Royal Collection tickets or merchandise whether over the telephone, via one of our websites, at a Royal Residence or gallery, or in one of our retail outlets, we use a third party provider to process credit or debit card purchases. Our provider adheres to the international security standards within the credit card industry.

We keep your information on secure servers and we fully comply with all applicable UK data protection and consumer legislation.

When we engage our technology partners to process personal information on our behalf, they do so on the basis of written instructions which require them to process your personal data and keep it secure in line with relevant legislation.

4 YOUR RIGHTS

As a data subject, you have a number of rights ("Subject Rights"). You can:

- access and obtain a copy of your data on request;
- ask us to change incorrect or incomplete data;
- ask us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing

You can at any time request a copy of personal information held about you, or exercise any of your other Subject Rights by contacting The Data Protection Manager, Information Assurance, Buckingham Palace, London SW1A 1AA or sending an e-mail to privacy@royal.uk.

5 CHANGES TO THIS PRIVACY NOTICE

Please check back frequently to see any updates or changes to our privacy notice.

6 CONTACTING US

If you have questions regarding our privacy notice, you can contact us at:

Royal Collection Trust
York House
St James's Palace
London SW1A 1BQ

www.rct.uk/about/royal-collection-trust/contact-us

The Data Controller for The Royal Collection Trust and Royal Collection Enterprises Limited is the Director of the Royal Collection.

Version 1.1