

Ambassador Programme Privacy Policy

Effective: 29/10/2020

1 Introduction

Ambassadors have taken part in either the Holocaust Educational Trust's (HET) *Lessons from Auschwitz* Project or Belsen75 and completed their Next Steps or Legacy Project. The programme aims to assist Ambassadors in sharing their experiences of learning about the Holocaust and its contemporary relevance by inviting survivors to speak, speaking at events, marking Holocaust Memorial Day, writing articles and many more.

Personal data is collected in order to keep in contact with Ambassadors about their educational journey and to offer them future opportunities such as events with speakers, lectures and workshops and to track activity relevant to the Ambassador Programme.

2 Onboarding

As mentioned above, once a participant has completed the *Lessons from Auschwitz* Project or Belsen 75 they automatically become an Ambassador for the Trust. Participants are free to opt out of being contacted by the Ambassador Programme if they choose to do so we will ensure that we do not retain any of their personal data. The personal data of Ambassadors will be given to us via the *Lessons from Auschwitz* Project/Belsen 75 registration sites where we will ensure they will be logged, securely held and access restricted to ensure personal data is not compromised.

Ambassadors are able to apply to become Regional Ambassadors and this application process occurs once a year. Regional Ambassadors have shown outstanding commitment to ensuring that the Holocaust is never forgotten. Their tenure lasts for three years, during which time they raise awareness of the Holocaust, galvanise the support of the Trust's Ambassador community and support other Ambassadors to embark on their own projects to remember the Holocaust.

The onboarding process for Regional Ambassadors is by way of an application form. If the applicant is unsuccessful, their form will be removed after 1 year. Successful applicants will have their forms retained for all three years of their tenure. Regional Ambassadors also have access to opportunities such as study days and study visits abroad. The application forms for these will be kept for 3 years before being removed. Following the completion of the Programme, Regional Ambassadors become alumni. The personal data of Regional Ambassadors is logged, securely held and access is restricted to ensure personal data is not compromised. Regional Ambassadors are also free to opt out of being contacted by the Ambassador Programme if they choose to do so and we will not retain their personal data. This will also remove them from the Programme.

3 Social Media Engagement As An Ambassador

We may ask Ambassadors to partake in awareness raising campaigns on social media by using specific hashtags or by writing a piece for us about their time and experiences as an Ambassador. We will not record Ambassador's social media handle/details, take their photos or copy what they have written, but record the date of the post, name and activity (e.g. "10 Aug 2020, Sarah Green tweeted with a specific hashtag on Twitter"). We do this to keep an active log of Ambassador engagement to help deliver awareness of what we do. If

Ambassadors do have concerns about this, they can contact us for further information using the details below.

4 Ambassador Networking

As part of being an Ambassador we detail and record personal data such as location, place of study and what subject. This will enable us to help Ambassadors engage with other Ambassadors who are in the same area and subject area to promote networking and collaborating on work they are doing with us. We will not retain this data indefinitely and will typically delete this data after Ambassadors cease contact with us or after 3 years from their last engagement.

5 Ceasing Contact With The Ambassador Programme

If at any time Ambassadors and Regional Ambassadors would like to stop being contacted by the Ambassador Programme Team they can contact us using the details below, they do not need to give a specific reason why. We will delete their data from our databases, but as mentioned above, if they have not actively engaged with us, we will delete their data after 3 years from their last engagement and they will cease to be contacted.

6 The Data We Collect & Lawful Basis

We only collect personal information that we know we will genuinely use and in accordance with the Data Protection Act 2018. The type of personal information that we will collect on you, and you voluntarily provide to us on this may include some or all of the following:

- Name
- Address
- Email
- Phone number
- Birth date
- School
- Education
- MP constituency
- Country of Birth
- Health data
- Nationality*
- Religion*

*The Ambassador Programme Team will not directly collect these personal data types but they will be passed on from the Lessons From Auschwitz or Belsen75 teams when an Ambassador becomes active.

You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to deal with you in an efficient and effective manner.

The lawful basis for processing your data is based on:

- Consent, in order to allow you to receive any marketing/promotional or event based communications from us. You also have the right to withdraw consent at anytime if you chose to do so

- Vital interests, Health, safety and welfare needs and concerns for those who partake on Ambassador trips
- Our legitimate interest that we will have requested/stated at the point the information was initially provided, therefore we will not store, process or transfer your data unless we have an appropriate lawful reason to do so.

7 How We Use Your Data

- For our own internal records.
- We will share your MP Constituency information with our Public Affairs Team so that they can inform Members of Parliament of Holocaust Educational Trust Ambassador activities happening within their constituency.
- To send registered users emails about our resources, programmes and events.
- To fulfil orders for tickets for events. We do not store credit card details nor do we share customer details with any 3rd parties.

8 Who We Might Share Your Data With

We may share your personal data with other organisations in the following circumstances:

- With other historical organisations and museums, including but not limited to: Yad Vashem (Israel) and March of the Living (UK).
- Airline, taxi and hotel companies in order to arrange appropriate transport, flights and hotels for our Ambassador Study Visits to Israel and Budapest.
- We may share your personal data with our third party ticketing provider, ArtOneZero, to help provide you with tickets for our annual Ambassador Conference.

Please note sharing of your personal data may involve transfers out of the UK to companies who are based in the EEA, an adequate listed country or a third country which may not have strict Data Protection Legislation similar to the UK. If we need to transfer your information outside the UK we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. For more information you can contact us using our details below.

9 Marketing Communications

As mentioned above we carry out certain marketing campaigns to help keep you informed of any events or promotional activities of the Ambassador Programme. We will ensure to capture your consent to opt in and you are free to withdraw your consent by clicking on the unsubscribe link at the bottom of the email communications. Alternatively you can contact ambassadors@het.org.uk where your request to withdraw consent will be carried out. You can also opt back in at any time by contacting ambassadors@het.org.uk.

10 Your Rights Over Your Data

10.1.1 The right to be informed about our collection and use of personal data;

You have the right to be informed about the collection and use of your personal data. We ensure we do this with our internal data protection policies and through our external website

policy. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

10.1.2 Right to Access Your Personal Information

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Data Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

10.1.3 Right to Correction Your Personal Information

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

10.1.4 Right to Stop or Limit Our Processing of Your Data

You have the right to object to us processing your personal information for particular purposes, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

10.1.5 Right to Erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

10.1.6 For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/>. If you are based elsewhere within the European Economic Area a list of supervisory authorities can be found here https://edpb.europa.eu/about-edpb/board/members_en

You can make a complaint to the ICO (or other supervisory authority) at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have. To make a complaint directly to us, please see our contact details below.

You can submit a complaint directly to the ICO via this link <https://ico.org.uk/make-a-complaint/>.

11 Data Retention

We retain personal data in accordance with the Data Protection Legislation requirements and for as long as necessary. If you have any questions or concerns to our data retention practices you can contact us directly using our details below.

12 Security

Data security is of great importance to HET and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data. We store your data on our secure servers based in the UK.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we have determined are entitled to be there;
- Implementing access controls to our information technology;
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores.

13 How to contact us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: info@het.org.uk

By telephone: +44 (0)20 7222 6822

By post: BCM Box 7892, London, WC1N 3XX