



INTRODUCTION

Welcome to The Honourable Society of the Middle Temple's privacy policy.

The Honourable Society of the Middle Temple ('the Inn') respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so that you can click through to the specific areas set out below. Alternatively, you can also download a PDF version of the policy from our website. Please also use the Glossary at the end of this policy to understand the meaning of some of the terms used throughout this document.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY (OR PRIVACY NOTICE)

This privacy policy aims to provide you with information regarding how the Inn collects and processes your personal data through your use of this website, including any data that you may provide through our websites, www.middletemple.org.uk and www.middletemplevenue.org.uk.

Our websites are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with our Data Protection Policy and any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

DATA CONTROLLER

The Inn is a data controller and is therefore responsible for your personal data (referred to as, “we”, “us” or “our” in this privacy policy).

We have appointed a data protection officer (DPO), who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

DPO CONTACT DETAILS

Andrew Hopkin
Director of Corporate Services
The Honourable Society of the Middle Temple
Middle Temple Treasury
Ashley Building
Middle Temple Lane
London
EC4Y 9BT
Tel: 020 74274800
Email: [**Data.Protection@middletemple.org.uk**](mailto:Data.Protection@middletemple.org.uk)

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance.



CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 6 December 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our privacy policy applies only to the Inn's websites and social media channels. Our websites may include links to third-party websites, social media channels, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

SOCIAL MEDIA

When engaging with the Inn's social media channels you are using the services of a third-party provider. You will therefore be subject to the data protection policies of those organisations in addition to those of the Inn. Such third-party providers are outside of our control and are not covered by this privacy policy.



2. THE DATA WE COLLECT ABOUT YOU

Personal data (or personal information) means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes home address, work address, billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have arranged with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, educational profile (particularly, which university you attended and what grades were achieved), references from third-parties in support of admission to membership, career progression information (pupillage and tenancy details), feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for the purposes of research, marketing, and strategic development. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We may need to collect **Special Categories of Personal Data** about you (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) for the purposes of member application, diversity monitoring and in connection with other legal requirements. We may also



need to collect information relating to criminal convictions and offences, which may include personal data relating to criminal allegations and proceedings (**Criminal Convictions Data**).

By submitting Special Category Personal Data and/or Criminal Convictions Data to the Inn, you explicitly consent to the collection and processing of that data for the purposes described above and at section 4 ('How we will use your personal data') below.

IF YOU WOULD PREFER NOT TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you (including any membership application) and you choose not to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have arranged with us. We will notify you if this is the case at the time.

Notwithstanding this, if you choose not to register or provide personal information, you can still visit most of the Inn's websites.



3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - complete online enquiry forms;
 - apply for membership of the Inn or other services;
 - apply for a tenancy (either professional or residential) in one or more of the Inn's buildings;
 - booking events and lodgings;
 - use the library document delivery service;
 - create an account on our websites or registering to access member areas on the websites;
 - updating your details through our online update forms and communication preferences;
 - subscribe to any of our membership services or publications including our newsletters;
 - request marketing to be sent to you;
 - complete a survey; or
 - provide feedback.

 - **Automated technologies or interactions.** As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Your IP address and web browser details are used when you log in but are not stored when the session finishes, i.e. when you log off. Statistical information about IP addresses and browsers is also collected. Please see the section headed 'Cookies' for further details.

 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - analytics providers such as Google based outside the EU;
 - advertising networks; and
 - search information providers.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from data brokers or aggregators.
 - Identity and Contact Data from publicly available sources.
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4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract (including membership agreement) we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Please see the section immediately below, headed ‘Purposes for which we will use your personal data’, to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending information that you have agreed to receive by updating your communications preferences with us. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member	(a) Identity (b) Contact (c) Graduate qualifications (d) References	Performance of a contract with you
To process and deliver membership application including: (a) manage payments, fees and charges (b) collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)



<p>To manage our relationship with you, which will include: (a) Notifying you about changes to our membership terms or privacy policy (b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to review how our members use our services)</p>
<p>To provide educational or training services to you as a member of the Inn</p>	<p>(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction (f) Usage</p>	<p>Performance of a contract with you</p>
<p>To enable you to complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to review how members use our services, to develop those services and to grow our membership base)</p>
<p>To administer and protect the Inn and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running the Inn, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how members use the Inn's services, to develop them, to grow our membership offering and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, member relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to keep our website updated and relevant, to develop the Inn's services and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about membership services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop the Inn's services and grow our membership base)</p>



MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To that end, we have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which membership and other services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have completed the relevant section of your communications preferences or arranged services with us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We do not usually share information collected on our websites with any other organisations for marketing or commercial purposes. However, where we propose to do so, we will obtain your prior express opt-in consent. Please visit the Inn's [Data Protection page](#) for more information on what we share with Third Parties.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your communications preferences, or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Please refer to your browser instructions or help screen to learn more about how to do this. Please note, however, that if you disable or refuse cookies, some parts of our websites may become inaccessible or not function properly and you may not be able to use certain services or facilities on our websites.

The Inn does not use cookies to collect personally identifiable information about you. It uses cookies to collect anonymous information to:

- Identify unique users
- Identify unique sessions
- Store information about users' sessions and campaigns

The Inn's websites use a limited number of third party suppliers to provide specific functionality.



Other than as stated in the Inn's Data Protection Policy, the Inn does not use cookies to collect any other information about you.

CHANGE OF PURPOSE

We will only use your personal data 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 obtain 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 data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do this.

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



5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 ('How we will use your personal data') above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



6. INTERNATIONAL TRANSFERS

We do not routinely transfer your personal data outside the European Economic Area (**EEA**). However, as the Inn maintains links with a number of its international societies, the Inn will, with the data subjects explicit consent, transfer limited personal data to the appropriate international society. This will allow members to maintain links with local members as well as with the Inn during their career.



7. DATA SECURITY

We store your data on secure servers in the UK. Anonymous cookie information may be stored on servers outside the UK depending on the third party supplier. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes that we collected it for, 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, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy, which you can request by contacting us.



9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes the right to:

- 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

For further information on your rights or if you wish to exercise any of the rights set out above, please visit the Inn's Data Protection page or, alternatively, contact us.

NO FEE USUALLY REQUIRED

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

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



10. GLOSSARY

LAWFUL BASIS FOR PROCESSING

Legitimate interest means the interest of the Inn in conducting and managing its affairs to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to do so by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of contract means processing your data where it is necessary for the performance of a contract to which you are a party (such as a membership application) or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal third parties

Other parties acting as separate controllers or processors and who are based in the United Kingdom and provide IT and system administration services.

External third parties

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- The Bar Standards Board acting as processors and/or separate controllers based in the United Kingdom in order to facilitate regulation of the profession.
- Other Inns of Court (The Honourable Society of the Inner Temple, The Honourable Society of Lincoln's Inn, and The Honourable Society of Gray's Inn) acting as processors and/or separate controllers based in the United Kingdom to facilitate effective administration of the profession.
- The Council of the Inns of Court (COIC) based in the United Kingdom who administer conduct and disciplinary matters on behalf of the Inns of Court.
- Professional advisers acting as processors and/or separate controllers including solicitors, barristers, bankers, auditors, pension scheme consultants, construction professionals, and



insurers based in the United Kingdom who provide consultancy, banking, legal, insurance, and accounting services to facilitate effective management of the Inn.

- HM Revenue & Customs, regulators, and other similar authorities acting as processors and/or separate controllers based in the United Kingdom who require the reporting of processing activities in certain circumstances.
- Pension scheme providers and scheme actuaries, each acting as separate controllers, based in the United Kingdom, who provide pension scheme administration and actuarial services.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data that you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.