

Website Privacy Notice

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The Honourable Society of the Middle Temple (‘the Inn’) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect and process your personal data when you visit our websites (regardless of where you visit them from), including any data that you may provide through our websites.

In this notice “Website(s)” refers to all of the Inn’s websites. This includes:

- the Inn’s main website at www.middletemple.org.uk
- the Middle Temple Venue website at www.middletemplevenue.org.uk
- the Middle Temple Shop website at www.middletempleshop.org.uk
- the Middle Temple Charity website at www.middletemplecharity.org.uk
- the Middle Templar website at www.middletemplar.org.uk
- the Inn’s library catalogue at www.middletemplelibrary.org.uk

The document is provided in a layered format so that you can click through to the specific areas set out below. It is also available as a PDF document at the bottom of this page.

This privacy notice should be read in conjunction with the Inn’s other Data Protection policies and notices which can be viewed on the Inn’s website: <https://www.middletemple.org.uk/about-us/data-protection>. These other documents provide more information about how the Inn uses and stores your data. If you would like more information please contact the Inn’s Data Protection Officer at data.protection@middletemple.org.uk

1. Important information and who we are

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 notice).

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

DPO contact details

Sarah Cates
Data Governance Manager
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

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 notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This version was last updated on 31 March 2021 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 notice 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 notice.

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 when you use our websites, which we have grouped together as follows:

- **Identity Data** includes first 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.
- **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**).

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 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 we collect your information

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 contacting us via the websites. This includes personal data you provide when you:
 - complete online enquiry forms;
 - apply for membership of the Inn or other services via the website (please see Membership Privacy Notice);
 - book events and lodgings;
 - use the library document delivery service;
 - create an account on our websites or register to access member areas on the websites;
 - update your details and communication preferences through our online update forms;
 - 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.

4. How we use your information

We will only use your personal data when the law allows us to. We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. There are six such permitted lawful bases for processing personal data. 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 'The purposes of processing your information', 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.

The purposes of processing your information

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) Identity (b) Contact	(a) Performance of a contract with you

(a) manage payments, fees and charges (b) collect and recover money owed to us	(c) Financial (d) Transaction (e) Marketing & Communications	(b) Necessary for our legitimate interests (to recover debts due to us)
To provide educational or training services to you as a member of the Inn	(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction (f) Usage	Performance of a contract with you
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(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)
To administer and protect the Inn and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use data analytics to improve our website, services, marketing, member relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop the Inn's services and to inform our marketing strategy)
To make suggestions and recommendations to you about membership services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop the Inn's services and grow our membership base)

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, see [here](#) for more information.

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. Who your information is shared with

We share your personal information with third parties only as necessary, including third-party service providers. As a principle, only minimal information will be shared as necessary and only where we have identified a lawful basis or exemption for doing so, and the data is proportionate to the need. These third parties will process your personal data on our behalf (as our Data Processor). We will disclose your personal data to these parties so that they can perform those functions, however we will enter into a written contract imposing appropriate security standards on them to ensure that they process your personal data in accordance with Data Protection legislation.

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.

We may also share your personal data with third parties, as authorised directed by you.

6. International transfers

If any of our processing activities require your personal data to be transferred outside of the United Kingdom, we will only make that transfer if:

- The country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- We have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- The transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- You explicitly consent to the transfer.

7. How long do we keep your personal data for?

We will only retain the majority of your personal data for a limited period of time. This will depend on a number of factors, including:

- Any laws or regulations that we are required to follow;
- Whether we are in a legal or other type of dispute with each other or any third party;
- The type of information that we hold about you; and
- Whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

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.

When it is no longer required in line with its retention period, personal information is securely and permanently destroyed.

8. How do we protect your data?

We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Please see the Inn's Data Protection Policy on the Inn's website <https://www.middletemple.org.uk/about-us/data-protection> for more detailed information about security of data.

9. Your rights

You have certain legal rights, which are briefly summarised below, in relation to any personal data about you which we hold.

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity.

		Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, (https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/) you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine-readable format.	<p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.</p> <p>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.</p>
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number or immigration status.	This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	This right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”), e.g. where your personal data is no longer	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.

	needed for the purposes it was collected for, or where the relevant processing is unlawful.	
Right to withdrawal of consent	Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

If you wish to exercise any of your rights please contact our Data Protection Officer at data.protection@middletemple.org.uk in the first instance. You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.