



Privacy Policy

The British School at Rome is committed to protecting your privacy and security. This privacy policy explains how and why we use your personal data, and is intended to help ensure that you remain informed and in control of your information.

ABOUT US

Founded in 1901 and receiving its Royal Charter in 1912, the British School at Rome is a charity registered in England and Wales (no. 314176). The governing body of the British School at Rome comprises the President, HRH Princess Alexandra, the Hon. Lady Ogilvy, KG, GCVO, and the Council (our Trustees). The Director acts as the British School at Rome's Chief Executive, and is responsible for the day to day management of the institution.

In this policy, 'we', 'us' and 'our' means the British School at Rome [henceforth the BSR].

Our registered address in the UK is at 10 Carlton House Terrace, London, SW1Y 5AH. Our address in Italy is via Gramsci 61, 00197 Rome.

YOUR PERSONAL DATA

We collect 'personal data', which is information that identifies a living person, or which can be identified as relating to a living person.

We collect different data dependent upon the reason that you are in touch or engaging with us. We outline below the main reasons, followed by information that applies across more than one area (for example our main database, our e-mail process and our website).

In this policy 'you' and 'your' means the individual to whom the information relates.

LAWFUL BASIS FOR PROCESSING PERSONAL DATA

Our lawful bases for processing are dependent upon the particular context (consent, contract and/or legitimate interests). Further details are given below for each of our main purposes.

LEGITIMATE INTERESTS FOR THE PROCESSING

We process personal information to

- fulfil our charitable objectives as set out in our Royal Charter and Supplemental Charter
- administer membership records and benefits
- fundraise and promote the interests of the charity
- offer awards
- offer taught courses
- offer and manage the use of our Library and Archive
- manage our Residence
- maintain relations with our alumni
- manage events for the public
- manage our employees and volunteers
- provide and pay for services, advice and consultancy
- maintain our own accounts and records

WHAT WE COLLECT, HOW WE USE IT AND WITH WHOM WE SHARE IT

1. MEMBERS

The BSR has a Membership scheme through which individuals can support us by making a gift, for which they receive certain communications and benefits.

Lawful basis for processing: contract, legitimate interests

1.1 WHAT WE COLLECT

We collect data you provide to us:

- personal details (title, name, address, e-mail, telephone)
- financial details (such as bank account details and direct debit authorisations, debit/credit card details, and whether your gift is gift-aided)
- Gift Aid declaration (for UK tax payers who wish to increase their gift in this way)
- details of your interests in any particular aspects of our activity
- details of the ways in which you wish to be contacted by us

We collect data resulting from your involvement with us. This could include:

- your membership history
- your attendance at events
- your requests for permits
- messages or letters sent and received

1.2 HOW DO WE USE THE DATA

We use the data you provide and that we record to:

- provide you with the benefits of membership (including invitations to events, our *Annual Review* and *Fine Arts*, apply for permits on your behalf)
- process your membership dues
- report to HMRC if you have signed a Gift Aid declaration
- keep you informed on our activities and news

- if your membership level includes it, to provide you with on-line access to and/or a print copy of *Papers of the British School at Rome*
- include you in the list of members published each year in our *Annual Review*

1.3 WITH WHOM DO WE SHARE YOUR DATA

- if you pay your membership by direct debit, we share your data with RSM. (See below),
- if you pay your membership by credit or debit card, we process your payment using WorldPay. (See below)
- if you pay your membership through our website, the payment is processed through PayPal. (See below)
- if you have provided a Gift Aid declaration, details of your payment are shared with HMRC
- copies of our *Annual Review* and *Fine Arts* are sent out directly from the printer. We provide them with your name and postal address, for use for this specific task only
- if your membership includes *Papers of the British School at Rome* we share your name, e-mail and (if applicable) postal address with Cambridge University Press. For those who receive a print copy, your name and address are also shared with the company that Cambridge University Press uses for despatch (currently Asendia)

2. DONORS

The BSR seeks and accepts donations for specific purposes and for general use towards our charitable objectives. Our Ashby Patrons scheme is an important aspect of this. We have a Donor Charter, published on our website (<http://www.bsr.ac.uk/support/donor-charter>)
Lawful basis for processing: legitimate interests

2.1 WHAT WE COLLECT

We collect data you provide to us:

- personal details (title, name, address, e-mail, telephone)
- financial details (such as bank account details and direct debit authorisations, debit/credit card details, and whether your donation is gift-aided)
- Gift Aid declaration (for UK tax payers who are able to increase their donation in this way)
- details of the reason for and terms of your donation
- details of the ways in which you wish to be contacted by us
- your signed gift agreement with us

We collect data resulting from your involvement with us. This could include:

- your donor history
- your attendance at events
- messages or letters that you have sent to us

2.2 HOW DO WE USE THE DATA

We use the data you provide and that we record to:

- recognise your donation according to our donor recognition policy
- satisfy any conditions of your gift agreement
- report to HMRC if you have signed a Gift Aid declaration

- report to you upon the use of your donation
- send you, for example, invitations to events, and copies of our *Annual Review* and *Fine Arts*

2.3 WITH WHOM DO WE SHARE YOUR DATA

- if you make your donation by direct debit, we share your data with RSM. (See below)
- if you make your donation by credit or debit card, we process your payment using WorldPay. (See below)
- if you make your donation through our website, the payment is processed through PayPal. (See below)
- if you have provided a Gift Aid declaration, details of your payment are shared with HMRC
- copies of our *Annual Review* and *Fine Arts* are on occasion sent directly from the printer. We provide them with your name and postal address, for use for this specific task only

3. LIBRARY MEMBERS

Researchers who are not staying with us in our Residence will need to ask for a Reader's ticket to use the library.

Lawful basis for processing: contract, legitimate interests

3.1 WHAT WE COLLECT

We collect data you provide to us:

- personal details (name, date of birth, place of birth, address, e-mail, telephone, ID card or passport number)
- if you use our Wi-Fi: login, password and e-mail address

3.2 HOW DO WE USE THE DATA

We use the data you provide and that we record to:

- process your membership dues
- provide you with a membership card allowing access to the Library (using 'Badge' software)
- provide you with access to e-journals (using 'LAccess' software)
- provide you with WiFi access whilst in the Library (using 'FirstSpot' access management system)

3.3 WITH WHOM DO WE SHARE YOUR DATA

We do not share your data outside the BSR

4. RESIDENTS

We provide residential accommodation for our award-holders, and are able to offer some rooms to those coming to Rome to pursue independent research projects

Lawful basis for processing: contract, legitimate interests

4.1 WHAT WE COLLECT

If you stay in our residence we ask you to provide us with certain information:

- personal details (title, name, e-mail, address, telephone)
- your current institutional affiliation
- title and brief details of the research project you will be undertaking whilst staying with us
- your passport or other valid ID details (issuing body [and your nationality], document number, expiry date, place of birth, date of birth)

We do not normally collect or store special categories of personal data. However there are some situations where we may need to do so. These may include, for example, if you are staying with us, we need to know about any access or dietary requirements you may have.

4.2 HOW DO WE USE THE DATA

We use the data you provide and that we record to:

- reserve a room for you (using RoomMaster software)
- produce a bill for your stay and any extras
- send required information for all those who stay with us to the Italian police authorities
- produce analyses of the use of the residence (e.g. for our reporting to the British Academy/BEIS)
- discuss with our catering staff any particular dietary requirements

4.3 WITH WHOM DO WE SHARE YOUR DATA

- the Italian police authorities, as required by Italian law
- if you pay your bill by credit or debit card, we process your payment using WorldPay. (See below)
- if you ask us to book a car service, we share your mobile telephone number with them, in case of any delay or change of plans

5. AWARD APPLICANTS

We offer various awards in the humanities, social sciences, visual art and architecture, all of which are selected on a competitive basis

Lawful bases for processing: legitimate interests, consent

5.1 WHAT WE COLLECT

- personal data (title, name, address, e-mail, telephone, nationality)
- date from which resident in the UK (if you do not meet the nationality criterion for an award)
- date of birth/age (where the the funder has set specific conditions)
- professional and educational information (present position, educational qualifications, career achievements)
- general information (knowledge of Italian, names and contact details of referees)
- where a fee is payable, credit/debit card details

5.2 HOW DO WE USE THE DATA

- to allow the selection panel to assess applications
- to process an application fee (through WorldPay). (See below)

5.3 WITH WHOM DO WE SHARE YOUR DATA

- with selection panel members (usually BSR Faculty members; occasionally guest artists on panels)

6. AWARD-HOLDERS

The core community of the BSR each year is formed of our award-holders, across the full range of our interests (humanities, social sciences, visual art and architecture)

Lawful basis for processing: legitimate interests

6.1 WHAT WE COLLECT

- personal data (title, name, address, e-mail, telephone, name as on passport, nationality)
- bank account details (where we pay a grant to you)
- next of kin name and contact details
- insurance policy details (insurer, policy number, emergency phone number)
- *for nine+ month award-holders: passport-size photographs, curriculum vitae*
- completed application form and references
- photograph of you taken during your residency
- your report upon your residency

We do not normally collect or store special categories of personal data. However there are some situations, as in the case of award-holders, where we need to do so, so that we can deal effectively and efficiently with an emergency. We need to know about any access requirements, medical conditions (including allergies) or dietary requirements you may have.

6.2 HOW DO WE USE THE DATA

- to publish a list of the names and (in some instances) the research project titles of award-holders
- to provide necessary information to Italian authorities
- to pay a research grant
- to discuss any particular requirements with our catering and housekeeping staff
- to deal effectively and efficiently with any emergency that might arise
- to report to our funders (whether trust/foundation/individual or the UK government)
- to apply for permits on your behalf
- *for nine+ month award-holders: to apply for a tessera on your behalf*

6.3 WITH WHOM DO WE SHARE YOUR DATA

- with Italian police authorities
- your residency report is shared with members of the BSR Faculties, as well as our staff
- your report may also be shared on occasion with those who have funded your award

7. ALUMNI

Our former award-holders form a network and community, and we hope that you will maintain a lifelong relationship with us

Lawful basis for processing: legitimate interests

7.1 WHAT WE COLLECT/HOLD

- personal data (title, name, address, e-mail, telephone)
- application material
- your report on your residency
- details of your achievements since holding a residency (e.g. publications, exhibitions, career progress)

7.3 HOW DO WE USE THE DATA

- to keep in touch with you and to maintain a lifelong relationship between you and us
- to involve you in our network and community of former award-holders
- to report upon the impact and outcomes of a residency at the BSR

7.3 WITH WHOM DO WE SHARE YOUR DATA

- we share information on your achievements on social media, in our newsletters and in our *Annual Review*
- we use information on your achievements in our reporting to our funders

8. TAUGHT COURSES

We offer some taught courses each year (in particular the Ancient Rome Summer School for undergraduates, and the City of Rome course for postgraduates)

Lawful bases for processing: legitimate interests, consent

A If you apply to participate in one of our taught courses:

8A.1 What do we collect

- personal details (name, date of birth, home address, university course, university address, grades, academic *curriculum vitae*)
- financial statement from you (if you apply to be considered for a bursary)

8A.2 How do we use the data

- to assess your application
- to assess your case for a bursary (if applicable)

8A.3 With whom do we share your data

We do not share your personal data outside the BSR

B If you participate in one of our taught courses:

8B.1 What do we collect

- personal details (name, date of birth, place of birth, passport number, passport expiry date, nationality, phone number, e-mail, home address, next of kin)
- institutional affiliation

We do not normally collect or store special categories of personal data. However there are some situations, including the taught courses, where we need to do so, so that we can deal effectively and efficiently with an emergency. We need to know about any access requirements, medical conditions (including allergies) or dietary requirements you may have.

8B.2 How do we use the data

- to record your participation in the course and, where applicable, report to your home university
- to enable us to request permits and free entry to sites
- to monitor take-up of course places and the higher education institutions with which we are collaborating

8B.3 With whom do we share your data

- with the relevant Soprintendenza/Sovrintendenza and/or other offices in charge of granting access
- for participants in our postgraduate City of Rome course, reports are sent to your home institution (as is part of the agreement)

9. ARCHIVE

The BSR has a rich Archive, which researchers are able to consult by arrangement, and from which we can supply images for your research and, in some instances, publication

Lawful basis for processing: legitimate interests

9.1 What do we collect

- if you are requesting to reproduce something from our Archive, we ask for: name, institutional affiliation, address, e-mail address and telephone
- if you are visiting and using our Archive, we ask for: name, profession, institutional affiliation, e-mail address and brief details of your research project

9.2 How do we use the data

- to monitor use of our Archive
- to monitor use of material

9.3 With whom do we share your data

We do not share your data outside the BSR.

10. PERMITS

We are able to apply on behalf of our Members, our award-holders and participants in our taught courses for special permission to visit sites and museums

Lawful basis for processing: legitimate interests

10.1 What do we collect

- personal details (title, name, institutional affiliation, nationality, date of birth, place of birth, passport number and expiry date, address, e-mail)
- research project summary

10.2 How do we use the data

- to request permission to visit a site or collection that you want to see

10.3 With whom do we share your data

- with the relevant Soprintendenza/Sovrintendenza and/or other offices in charge of granting access

11. EVENT ATTENDANCE

We hold many events, in Rome and the UK, most of which are open to the general public

Lawful bases for processing: legitimate interests, consent

11.1 What do we collect

- for events in Italy we ask you to sign in with your name
- for events in Italy, you may give your e-mail address if you wish to receive communications from us
- for events in the UK, we ask you to RSVP (generally in case of acceptance only), with your name and e-mail address

11.2 How do we use the data

- to know how many people attended an event
- for events in the UK, to confirm your attendance and/or notify you of any late changes
- to be able to inform those who have given their consent of other events that are taking place and of BSR news
- to help us compile statistics for reporting to our government funding bodies

11.3 With whom do we share your data

We do not share your data outside the BSR

12. MAILING LISTS

We have various mailing lists that we use to inform those who have given their consent (or with whom we have legitimate interests) about our activities, awards, events and news

Lawful bases for processing: consent, legitimate interests

12.1 What do we collect

- personal details (name, e-mail)
- your consent and mailing preferences

12.2 How do we use your data

- to send you e-mails

12.3 With whom do we share your data

- we use Constant Contact to send bulk e-mails. (See below)

13. EMPLOYMENT OPPORTUNITIES

We advertise job vacancies as they arise, and suitable applicants are asked to submit an application (usually a cover letter and *curriculum vitae*).

Lawful basis for processing: consent

13.1 What do we collect

- personal details (name, e-mail, phone, postal address)

- professional and educational information (e.g. current position, employment history, degrees held, publications, exhibitions)
- referees names and, if shortlisted, references

13.2 How do we use your data

- to assess your qualifications and suitability for the position for which you have applied

13.3 With whom do we share your data

- the selection panel members, normally formed of our senior staff and/or Trustees

14. SUPPLIERS, THIRD PARTY SERVICE PROVIDERS, ADVISERS AND CONSULTANTS

We order goods and services, and engage advisers and consultants.

Lawful basis for processing: contract, legitimate interests

14.1 What do we collect

- personal details (name, e-mail, phone, postal address)
- financial details (bank account details)

14.2 How do we use your data

- to pay you

14.3 With whom do we share your data

We do not share your data outside the BSR

15. PARTNERS AND COLLABORATORS

We work with various partners and collaborators (both individual and institutional) on, for example, research projects and events.

Lawful basis for processing: legitimate interests, contract, consent

15.1 What do we collect

- personal details (name, e-mail, phone, postal address)

15.2 How do we use your data

- to contact you to set up and arrange partnerships and collaborations
- to deliver our joint activities

15.3 With whom do we share your data

We do not share your data outside the BSR

16. STAFF

The Privacy Notice for staff forms part of the Staff Handbook.

OUR WEBSITE

The British School at Rome website may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

When you submit your details on any areas of the BSR website we may receive personal information about you. This can consist of information such as your name, e-mail address, postal address, telephone or mobile number or date of birth, depending on the online form you completed. In doing so you enable the BSR (and where applicable its contractors) to provide you with the services or activities you select and to deal with your requests and enquiries.

We will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies). Generally, we will only use your information within the BSR. However, the BSR may sometimes be required to use third parties to process your information on our behalf. These third parties will have to comply strictly with our data protection rules and we require that they do not use your personal information for their own business purposes, unless you have explicitly consented to the use of your personal information in this way.

Cookies on our website

<i>Cookie Name</i>	<i>Description</i>	<i>Duration</i>
wordpress_test_cookie	WordPress test cookie	Session
wordpress_[hash]	On login, wordpress uses this cookie to store your authentication details. Its use is limited to the admin console area.	Session
wordpress_logged_in_[hash]	After login, wordpress sets this cookie, which indicates when you're logged in, and who you are, for most interface use.	Session
civicCookieControl	Cookie Control cookies. These cookies are set in order to remember preferences in regards to cookies.	90 days
HACIVIC	This is used by Cookie Control to remember the preference you have set. The cookie is only valid during current browser session and it will be deleted when you close browser.	Session
__utma	Google Analytics: We use Google Analytics to monitor traffic levels, search queries and visits to this website.	Two years after your last visit to this site
__utmb	Google Analytics stores IP address anonymously on its servers in the US, and neither CIVIC or Google	30 minutes after your visit, or after 30 minutes of inactivity

__utmc	associate your IP address with any personally identifiable information. These cookies enable Google to determine whether you are a return visitor to the site, and to track the pages that you visit during your session.	Session
__utmz		Six months after it was last set
NID		Six months after it was last set

CONSENT

E-mails that we send you through Constant Contact all have an ‘unsubscribe’ option in them, as well as the option for changing your mailing preferences.

If you have previously given your consent but change your mind, you may use the ‘unsubscribe’ option or you may contact us by any other method (e-mail, phone or letter) to ask us to remove you from our mailing lists.

THIRD PARTIES

We use a secure, password-protected, on-line database, using DonorPerfect software, to store personal data.

We process payments by credit or debit card using WorldPay, a secure online payment gateway. <https://www.worldpay.com/uk>

We accept payment on our website through PayPal. PayPal’s privacy notice can be found here: https://www.paypal.com/webapps/mpp/ua/privacy-full?locale.x=en_GB

Payments to us by Direct Debit are processed by RSM 2000. You can see their privacy policy here: <https://www.rsm2000.co.uk/page/privacy-policy>

We use Constant Contact to send group e-mails (including our newsletter, event invitations, award notices). Its privacy statement can be found here: <https://www.constantcontact.com/uk/legal/privacy-statement>

We use Google Analytics to monitor traffic levels on our website. Google’s privacy policy is available here: <https://policies.google.com/privacy?hl=en>

Other than the specific examples mentioned above, required to provide the benefits requested and/or offered, we do not share your personal data with third parties.

OUR RETENTION POLICIES

We will retain your personal information only for as long as is necessary to fulfil the purpose(s) for which we collected it, and as required by relevant legal, accounting and reporting requirements in the UK and/or Italy.

Special category data noted above are retained only until the end of your stay with us.

We regard our current and recent members, current award-holders, alumni, Council members (Trustees) and Faculty members as members of our community, with whom we have legitimate interests, and usually retain personal information until such time as we are requested to remove it.

We will continually review what information we hold and will delete personal data that is no longer required.

YOUR RIGHTS

We want to ensure that you remain in control of your personal data and that you understand your legal rights.

You have

- the right to be informed about the collection and use of your personal data
- the right to access your personal data
- the right to have inaccurate personal data that we hold on you corrected, or completed if it is incomplete
- the right to have your personal data erased (unless the processing is necessary, for example to comply with a legal obligation, for archiving purposes in the public interest, scientific research, historical research or statistical purposes)
- the right to restrict processing
- the right to data portability
- the right to object

DATA PROTECTION OFFICER

The BSR's Data Protection Officer is Raphaële Mouren. Any questions you may have in relation to this Privacy Policy or how we use your personal data should be sent to: gdpr-dpo@bsrome.it

COMPLAINTS

Should you have a complaint about how we have used your personal data, you can complain to us directly by contacting our Data Protection Officer.

If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy to ensure that it remains up to date and continues to reflect how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last revised 19 December 2019 [Data Protection Officer details updated]

The BSR's Privacy Policy was approved by the BSR's Council most recently in June 2018