

The Haberdashers' Company Privacy Policy

Version 1 – 04.09.26

1. Overview

The Haberdashers' Company (also known as The Worshipful Company of Haberdashers and including the Haberdashers' Foundation) ("the Company", "we", "us", "our") is committed to protecting your privacy and keeping your personal information secure.

This policy explains what personal information we collect, how and why we use it, who we share it with, how long we keep it, and the rights you have. It also explains how to make a complaint about the way we handle your personal data.

This policy applies to members of the Company (including the Court of Assistants, Livery and Freedom), our staff and trustees, school governors, donors and supporters, beneficiaries of our charitable giving, participants in our education and outreach activities (including the Haberdashers' Aspire programme and school visits to Haberdashers' Hall), visitors and event attendees, and users of our website.

We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (as amended by the Data (Use and Access) Act 2025), the Privacy and Electronic Communications Regulations 2003 (PECR), and any other applicable data protection law. We maintain appropriate physical, technical and organisational measures to safeguard the information we hold and to prevent unauthorised access or disclosure.

2. Who we are

The Haberdashers' Company is one of the Great Twelve livery companies of the City of London. Our registered office is Haberdashers' Hall, 18 West Smithfield, London EC1A 9HQ. We are registered with the Information Commissioner's Office under registration number Z7159344.

The Company is the data controller for the personal information described in this policy. Some of the schools, charities and programmes connected with the Company — including Haberdashers' schools, the Haberdashers' Foundation, and other grant-recipient charities — are separate legal entities and act as data controller in their own right for the personal information they hold, for example pupil records. For communications, the Company as trustee of the Haberdashers' Foundation is the data controller for all marketing communications including fundraising communications.

Data protection queries, requests and complaints are handled by the Director of Finance, who can be contacted using the details in the Contact us section below.

3. The data protection principles

We follow the principles set out in the UK GDPR. These require that personal information is:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes and not used in any manner incompatible with those purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept in a form which identifies you for no longer than is necessary
- processed in a way that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage

We are also accountable for our compliance with these principles and must be able to demonstrate it.

4. Information we collect

To carry out our charitable, ceremonial, educational and administrative activities, we collect and use personal information about, among others:

- members of the Company and applicants for membership
- our staff
- trustees and the school governors we appoint or support
- donors, benefactors and supporters
- beneficiaries of our charitable giving, grants and bursaries
- the schools and organisations we support
- children and young people who visit Haberdashers' Hall, attend ceremonies or events, or take part in the Haberdashers' Aspire mentoring programme
- visitors to Haberdashers' Hall and event attendees
- users of our website

Depending on your relationship with us, this may include:

- **Personally identifiable information:** your name and contact details (email address, telephone number, address)
- your date of birth
- financial data necessary for us to process donations and memberships
- your marketing preferences, donation and Gift Aid records
- images and video taken at events
- technical and usage data such as your IP address, device and browsing information collected via our website (see our Cookie policies)
- information relating to your attendance at or interest in events at the Company

Where we work with schools connected to the Company — including through visits, ceremonies, bursaries, or the Haberdashers' Aspire programme — we may receive limited information about pupils and students, such as name, school, and date of birth, and, where relevant to the specific purpose (for example a safeguarding concern, an accessibility need, or a bursary or grant application), special category data such as information about a disability or health condition. We only collect what is necessary for that purpose, and the relevant school remains responsible for its own pupil records, as set out in its own privacy notice.

We may also process special category data (for example concerning health or dietary requirements) and, exceptionally, criminal offence data, where this is volunteered to us or is necessary, for example for safeguarding, equality monitoring, or assessing eligibility for charitable support.

Such information may be held securely on computer, on paper or on other media, and is always obtained and handled lawfully with limited access.

5. How we use your information and our lawful bases

We use your personal information to:

- administer membership of the Company and its governance
- manage donations, grants and bursaries
- process Gift Aid claims and our wider charitable giving
- organise ceremonies, events and visits, including school visits and the Haberdashers' Aspire programme

- safeguard children and vulnerable people in accordance with our Safeguarding Statement and Code of Conduct
- respond to enquiries and provide support
- keep a record of our communications so we can resolve any issues
- tell you about our activities, events and news, where you have agreed
- carry out marketing
- carry out research and improve our activities
- prevent fraud
- comply with our legal and charitable reporting obligations

We rely on one or more of the following lawful bases, depending on the activity:

- performance of a contract with you and compliance with a legal obligation
- your consent, and our legitimate interests, for example administering membership, managing relationships with donors and beneficiaries, and improving our activities, balanced against your interests and rights; and, occasionally, the protection of vital interests

Where we process special category data, we rely on an additional condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018, such as your explicit consent, or because the processing is necessary for safeguarding or our charitable purposes. Where we rely on legitimate interests, we carry out a data protection impact assessment, and where we rely on consent you may withdraw it at any time.

6. Cookies and similar technologies

Our websites, haberdashers.co.uk and members.haberdashers.co.uk, use cookies and similar technologies, including strictly necessary cookies (for example to enable login, navigation and account functions), functionality cookies (to remember your preferences), and analytical cookies, such as those used by Google Analytics, to help us understand how visitors use our site. Where consent is required, you can manage or withdraw it through your browser settings or, where available, our cookie banner. Following changes made by the Data (Use and Access) Act 2025, we may use certain low-risk cookies, such as analytics used to improve our service, without consent, while still giving you clear information and a way to object. Further detail is set out in our separate Cookie Policies, available on our website.

7. Marketing and your choices

Where we send you marketing and communications by electronic means, for example about our events, appeals or news, we do so in accordance with PECR and the UK GDPR. You can opt out of marketing at any time by using the unsubscribe option in our messages or by contacting us. Opting out of marketing or fundraising marketing does not affect any other processing we carry out on other lawful bases.

8. Protecting your information

We employ technical and organisational security measures appropriate to the nature of the data we hold, including any special category data. Only authorised individuals are given access to personal data, under confidentiality and data protection obligations, and any breach of those obligations is treated as a disciplinary matter. While we work hard to secure our website and systems, no transmission of information over the internet can be guaranteed to be completely secure, and any such transmission is at your own risk.

9. Children and safeguarding

Children and young people visit Haberdashers' Hall, take part in ceremonies and events, and participate in programmes such as Haberdashers' Aspire, organised together with Haberdashers' schools. Where we collect personal information about a child, we collect only what is necessary for the purpose — for example, to run a safe visit or programme, or to record a safeguarding concern — and, where appropriate, we work with parents, guardians and the relevant school. Any safeguarding concern is handled in accordance with the Company's Safeguarding Statement and Code of Conduct, and any related records are kept confidential, accurate and securely stored in line with this policy.

10. Information we share

We may share your personal information with:

- Haberdashers' schools, the Haberdashers' Foundation and other connected charities, for example in connection with bursaries, grants, safeguarding, or joint events and programmes
- carefully selected third-party service providers who process it on our behalf under written contracts that meet the requirements of data protection law, for example providers of our donor and membership database, accounting, mailing, event, IT and website services
- our professional advisers, including legal advisers, accountants and auditors
- third parties where required or permitted by law, including regulators, law enforcement authorities, and the Charity Commission

We do not sell your personal information, and you have the right to withdraw consent at any time.

11. Third party processors

We periodically appoint service providers to carry out activities on our behalf, under contracts that require them to protect your information. These currently include providers of our donor and membership database, accounting and Gift Aid administration systems, website hosting and analytics (including Google Analytics), event management services, and print and mailing services (including InPrint Digital Solutions Ltd for our Haberdasher magazine). Further details of our current processors are available on request from the Director of Finance.

12. International transfers

We do not currently transfer personal data outside the United Kingdom. If this position changes — for example because a service provider stores data outside the UK — we will ensure an appropriate safeguard is in place, such as UK adequacy regulations or the International Data Transfer Agreement, so that your information continues to receive a level of protection consistent with UK data protection law.

13. How long we keep your information

We retain your personal information in accordance with our records retention policy and to comply with our legal, regulatory, financial and charitable reporting obligations.

For example, donation and Gift Aid records are normally retained for a minimum of six years to meet HMRC requirements. The right to have your data erased is not an absolute right, and we may need to retain information where it forms part of a statutory or legal obligation, an ongoing safeguarding matter, or an existing agreement.

14. Your responsibilities

Please tell us as soon as possible if any of the personal information you have provided to us changes or update your records [here](#).

15. Your rights

Depending on the lawful basis for processing, you have the following rights. In most cases these rights are not absolute:

- to be informed about how we use your personal data
- to request a copy of the personal data we hold about you, known as a subject access request
- to have inaccurate personal data corrected
- to have your personal data erased in certain circumstances
- to restrict our processing in certain circumstances
- to data portability in certain circumstances
- to object to processing, including profiling, for direct marketing
- to withdraw your consent where we rely on it

There may be compelling or overriding legal reasons why we cannot meet a request in full, in which case we will explain why. To exercise any of these rights, please contact us using the details in the Contact us section below.

16. Complaints and subject access requests

If you are unhappy with how we have handled your personal data or a rights request, you can complain to us directly. This reflects the statutory right introduced by the Data (Use and Access) Act 2025, in force from 19 June 2026. Making a complaint to us is free of charge and does not affect your right to complain to the regulator or to seek a remedy through the courts.

You can complain by email to fd@Haberdashers.co.uk, or by writing to the Director of Finance at the address in the Contact us section below.

Please include your name and contact details, what your complaint is about, the personal data or interaction involved, and the outcome you are seeking. We can still consider your complaint if you cannot provide all of this. If you need help to complain, or a particular format or adjustment to assist you, please advise us.

How we handle your complaint:

- we will acknowledge your complaint within 30 days of receiving it
- we may ask you for information to confirm your identity, requesting only what is proportionate
- the Director of Finance, or someone acting under their direction, will investigate
- we will respond without undue delay, aiming to provide a full response within one month of acknowledgement. If the matter is complex we will tell you why we need longer and give you a revised timescale
- we will explain the outcome and how to take the matter further if you remain dissatisfied

Subject access request procedure

You have the right to ask for a copy of the personal data we hold about you, together with related information. This is known as a Subject Access Request.

You can make a request in writing or verbally, but we would prefer that you make it in writing to fd@Haberdashers.co.uk, or by post to the Director of Finance at the address in the Contact us section below, as this helps us deal with it promptly. You do not need to use a particular form.

To help us respond, please tell us:

- your full name and contact details
- any membership, donor or reference number you have with us

- the personal data or records you are looking for, and any relevant dates
- the format in which you would like to receive the information

We will ask you for information to confirm your identity, so that we do not disclose your personal data to the wrong person. The one month period for responding does not begin until we have verified your identity and, if your request is unclear or wide-ranging, received any reasonable clarification we have requested.

We will respond within one month, as required by the UK GDPR. However, we may extend this by up to two further months where a request is complex or where we receive a number of requests from you. We carry out a reasonable and proportionate search for the information you have requested.

We will provide a copy of your personal data, together with:

- information about how and why we process it
- who we share it with
- how long we keep it
- the source of the data where relevant

We will provide the information securely, and electronically where you have made your request electronically, unless you ask otherwise.

A subject access request is usually free of charge. We may charge a reasonable fee, or refuse to act, where a request is manifestly unfounded or excessive, and we will contact you to explain our reasons. Where the information includes personal data about other people, or is subject to an exemption under data protection law, we may redact or withhold that part and will tell you where we have done so.

If you remain dissatisfied, you have the right to complain to the data protection regulator. We ask that you raise your complaint with us first and the regulator may expect you to have done so.

The Information Commissioner's Office can be contacted as follows:

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone: 0303 123 1113
Website: ico.org.uk

You also have the right to apply to the courts for a remedy.

17. Contact us

To exercise your rights, to make a complaint, or for any question about this policy, please contact:

The Director of Finance
The Haberdashers' Company
Haberdashers' Hall
18 West Smithfield
London EC1A 9HQ
Email: fd@Haberdashers.co.uk

18. Changes to this policy

We may update this policy from time to time. The current version, together with its version number and date, is shown at the top of this document and is available on our website. This policy is owned and reviewed at least annually or sooner if there is a relevant change in law, regulation or regulatory guidance.