



Museum of Domestic  
Design & Architecture

## **General Privacy Policy**

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## **I. Who We Are**

The Museum of Domestic Design and Architecture houses collections relating to domestic design, furnishings and interiors. Its core collection, the Silver Studio Collection, was Designated in 2008. The museum is part of [Middlesex University](#), and the collections are well used by students from Middlesex University and elsewhere: public access is provided by appointment, by talks, lectures and publications. All staff are University employees. Middlesex University Higher Education Corporation is registered as a Data Controller by the Information Commissioner's Office (ICO), Registration Number Z5439728. This privacy statement outlines why we collect personal data, how we use it, keep it safe and the rights of those whose data we hold.

## **II. Why We Collect Data**

We collect, store and process personal data of our website users, Study Room users, and those who research, study and work with or for us, for the purposes of fulfilling our contractual and legal obligations and responsibilities.

## **III. How We Store Data**

Personal data is stored securely in digital form, on a variety of platforms, as laid out in this document. We also hold a small amount of personal data on paper (for example older museum records) which are stored securely in locked cabinets, to which only museum staff have access. All museum staff are provided with a personal laptop by Middlesex University, and email and file storage are managed via Microsoft 365. Multi-Factor Authentication is now a requirement for logons to Microsoft 365 services, adding a layer of protection above a password and mitigates many threats associated with using just a username and a password.

As Middlesex University employees, all museum staff are required to undertake Data Protection training and are further advised of data protection issues in particular circumstances such as working from home. See for example:

<https://naomikorn.com/wp-content/uploads/2020/06/Working-From-Home-Top-Tips-for-Legal-Compliance.pdf>.

#### **IV. How We Use Personal Data**

We may use your information to:

- process a financial donation that you have made;
- Process a donation you have made to MoDA's collections (eg objects, photographs, recordings)
- process orders that you have submitted via the museum shop;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about events or our newsletter;
- Retain details of work you have created/research you have undertaken that relates to our collections
- Pay you if you are a supplier of goods or services

#### **Retention periods**

We will only ever collect the information we need. When we ask you to provide your personal information we will let you know why we are asking and how we will use your data, by directing you towards this notice. We store and retain personal data for various periods of time in line with our legal obligations, financial regulations, and internal requirements. We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for:

- Achieving the purpose the data was collected for
- Providing you with the goods, services or information you have requested
- The administration of your relationship with MoDA
- Complying with the law
- Ensuring MoDA does not communicate with individuals who have requested no further communication.

We destroy non-relevant paper files at regular intervals and electronic information is stored securely.

What personal data do we collect and why?

**a. If you are an E-newsletter subscriber**

What we collect	Why	Legal Bases
We may collect your email address and communication preferences from you when you sign up to our mailings	You have agreed that you wish to be informed about our work, events, products, special offers and ways of supporting MoDA	We will only send you these communications via email if we have your consent to do so

If you consent to receive information by email, your email address and communication preferences are held by Mailerlite, which is the email marketing system we use to send out our e-newsletters, and they are used only for the purpose of sending you these communications.

You can choose to opt out of these marketing communications at any time by contacting us at [moda@mdx.ac.uk](mailto:moda@mdx.ac.uk) or by using the unsubscribe link at the bottom of every e-newsletter.

**b. If you are a customer of our online shop**

Third Party Service Providers working on our behalf handle your information for the purposes of completing tasks and providing services to you on our behalf. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and they abide by Data Processing Agreements that require them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law. If you do not provide your details, we will not be able to process your payment and you will be unable to buy items through the shop.

What we collect	Why	Legal Bases
We may collect your name, postal address, email address and phone number from you	To provide you with the products you purchase	This is required for the contract (sale of the product or service)

when you buy items through our shop		
Bank details	We require these details to process the sale.	This is required for the contract (sale of the product or service)

**c. If you make a financial donation online**

The Museum of Domestic Design and Architecture welcomes online donations via <https://www.committedgiving.uk.net/middlesex/public/Donation.aspx>. This service is managed via Middlesex University's website. Third Party Service Providers working on our behalf handle your information for the purposes of completing tasks and providing services to you on our behalf. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and they abide by Data Processing Agreements that require them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law. If you do not provide your details we will not be able to process your donation.

What we collect	Why	Legal Bases
We may collect your name, postal address, email address and phone number from you when you make a donation.	If you sign up to Gift Aid we are required to obtain your name and postal address	It is a legal requirement for this process.
Bank details	To allow us to process your payment.	This is required for the contract (sale of the product or service)

**d. If you visit our website**

**website cookies**

In order to make the Museum of Domestic Design & Architecture's website ([www.moda.mdx.ac.uk](http://www.moda.mdx.ac.uk)) easier to use and improve our service, we sometimes place small amounts of information on your computer. These are known as cookies and they are used

by most major websites. Where possible we avoid storing any sensitive or tracking information in these cookies.

Our cookies do not contain any personal information about you. You can choose to refuse cookies. We encourage you to accept the cookies our website uses as they help us to improve the user experience for you.

To control cookies use the controls in your browser. A summary of these is available on the [All About Cookies](#) website.

For more information on the law and cookies see the Guide to Privacy and Electronic Communications Regulations - Cookies and similar technologies page on the [Information Commissioner's Office](#) website. Please see also the Middlesex University Cookie Policy <https://www.mdx.ac.uk/about-us/policies/cookies>

### **Essential Cookies**

These cookies ensure the website performs and you can use all of its features. A full list is available on the [WordPress cookies](#) page.

### **Information cookies**

These cookies collect anonymous information about how a website visitor uses the website. They are anonymous and don't collect any information that could identify you. The benefit of this is it allows us to see how the website performs and which bits people want to use.

- A full list, including information cookies, is available on the [WordPress cookies](#) page.
- Google Analytics is used on this website and you can find out more on the [Cookie Law](#) website.
- Alternatively, you can [opt out of Google Analytics](#) for all websites.

### **Website functions cookies**

These cookies remember any preferences you might set when using the website. For example, if you set the text size and any customisation options. They can include commenting information on pages as well.

### **Third party cookies**

Most third-party cookies allow links to other websites. In particular this type of cookie connects to social and sharing websites like Pinterest, Facebook and Twitter. Using these cookies allows you to share interesting content without leaving the website.

This website uses Share This for these links and their cookie policy is available on their [support](#) pages.

**e. If you leave a comment on the website**

We require you to fill in your name and email address and consent to your data being processed in order to leave a comment on our website, in order to reduce comment spam. Your email address will not be published with the published comment, and this data is deleted from the back-end of the website on a regular basis.

**f. If you donate object(s) to the museum's collections**

We are required to hold certain kinds of personal data in perpetuity in order to manage the collections of the Museum of Domestic Design & Architecture for the benefit of future visitors, students and researchers. We need to keep records that show that you agreed to donate your items (such as objects, photographs, sound and/or video recordings), and other associated information about these items such as copyright permissions etc. If you do not provide your information we will not be able to accept your donation.

What we collect	Why	Legal Bases
We will collect your name, postal address and email address. We may also ask for your phone number and date of birth.	To record the details of disposals from and gifts, purchases and loans to our collections	It is necessary for us to carry out our Public Task or exercise our official authority as a Designated Museum and it is a legal requirement for this process.
	To record and manage details of makers/creators of items in our collections	It is necessary for us to carry out our Public Task or exercise our official authority as a Designated Museum.
	To enable us to lend items to other institutions or researchers	It is necessary for us to carry out our Public Task or exercise our official authority as a Designated Museum and it is a legal requirement for this process.
	To ensure that we comply with copyright legislation when providing copies of items in our collections	This is a legal requirement for this process
	To undertake object conservation and/or scientific	This is a legal requirement for this process and forms part of

	analysis (for outside agencies)	the Terms and Conditions of contract with us.
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**g. If you contact us with an enquiry**

We use a Customer Relationship Management system (currently Capsule) to manage enquiries about our collections and respond to them efficiently. We also use GravityForms Trello and Slack to help us manage enquiry workflows. Our policy is to delete personal information from all platforms once an enquiry has been answered, but personal information is retained in Capsule to help us manage and respond to enquiries you might make in future. If you do not provide some of your information, we will not be able to respond to your enquiry.

What we collect	Why	Legal Bases
Your name, contact address, personal e-mail address, telephone number from you when you make your enquiry.	To enable us to respond to your general business enquiry	On the basis of Legitimate Interests in answering your enquiry about or relating to the museum's collections.
	To enable us to respond to Freedom of Information requests, complaints and requests made under Data Protection legislation	This is a legal obligation
	To enable us to respond to enquiries about our collections	This is part of our Public Task as a Designated Museum
	To enable us to respond to your enquiry about a booking, purchase or reservation.	This is required for the contract (sale of the product or service)

**h. If you make an appointment to visit the Study Room**

We use an online system called LibCal to manage appointment booking. We have an optional follow-up survey using SurveyMonkey/Momentive. We also collect certain kinds of personal data from everyone who visits the Study Room. We do this partly for reporting purposes, so we can demonstrate how many people visited and what kinds of people they

are (eg students, non-students etc). We also need to keep some details about you and what you have looked at so that we can help you if you have further questions about our collections.

What we collect	Why	Legal Bases
Your name, contact address, personal e-mail address, telephone number from you when you make a booking; details of the objects you have looked at during your visit	To record details of which objects have been used in order to prioritize conservation work; and so that we can find the same objects if you wish to visit again or use them for research or licensing purposes	On the basis of Legitimate Interests and in the interests of providing a good service to users.

#### **i. If you supply us with Goods or Services**

The Museum of Domestic Design and Architecture is part of Middlesex University, and all contracts and finances are managed via the University's Finance Department.

What we collect	Why	Legal Bases
Your name, company name, contact address, e-mail address, telephone number from you or your employer	To enable us to make payments, send remittances, answer queries etc and fulfil our relationship with you as a supplier.	This is a legal requirement and forms part of the Terms and Conditions of contract with Middlesex University.
Bank details	To enable us to make payments, send remittances, answer queries etc and fulfil our relationship with you as a supplier.	To perform the contract with you.
Unique Taxpayer Reference (UTR) Company Registration Number (CRN)	To enable us to make payments, send remittances, answer queries etc and fulfil our relationship with you as a supplier.	To perform the contract with you.

The source of our information is usually you. We do not gather information about you from third parties such as social media companies.

We do not make any decisions about you using automated technologies.

**j. If you apply for a job at Middlesex University**

Personal data of applicants for jobs at Middlesex University is stored securely in the online recruitment system (Stonefish), to which only authorized staff have access. Candidates' details are stored for a specified period in accordance with the University's privacy policies, and anonymised data is retained for Equal Opportunities monitoring and reporting purposes.

What we collect	Why	Legal Bases
We may collect your name, postal address, email address and phone number; details of qualifications and employment	Necessary part of the recruitment and selection process	It is a legal requirement for this process.
Passport details, RTW status, ethnic origin		

**k. If you respond to a survey or request for feedback**

We occasionally produce surveys to find out what our audiences think or ask for feedback on a particular event. We use Survey Monkey/Momentive to do this.

What we collect	Why	Legal Bases
We may collect your name and email address and possibly other information such as age and educational status	In order to understand more about how to improve our services to our audiences	We always anonymise survey results  We do not retain your data without explicit permission. We delete personal data after the event and always within a two year period.

**l. If you book an event that we are running**

We use Eventbrite and LibCal to manage events and bookings. We delete personal data from those platforms after an event: we never retain it without your explicit permission

What we collect	Why	Legal Bases
We may collect your name and email address	In order to communicate with you about the event	We do not retain your data without explicit permission. We delete personal data from booking platforms after the event.

**m. If you create research in response to MoDA's collections**

We use a Customer Relationship Management system (currently Capsule) to manage research enquiries about our collections and respond to them efficiently. We use a Cultural Institution Collections Management System (currently CollectionsIndex+) to collect information about how our collections have been used for inspiration and research. This is partly so we can report on what our activities and partly so that we are aware of new research. It also helps us to keep track of what we have agreed with you about making aspects of your work public

What we collect	Why	Legal Bases
Your name, contact address, personal e-mail address, telephone number; details of the objects you have looked at, copies of your research outputs where relevant	To record details of which objects have been used in order to prioritize conservation work, report to funders, record and share research; and so that we can find the same objects if you wish to continue your research or for licensing purposes	On the basis of Legitimate Interests and in the interests of providing a good service to users.

**n. If you are a licensee or image library customer**

We need to keep your personal details that are provided and recorded within agreements. That data may be shared with MU Ventures Ltd (a company whose sole trader is Middlesex

University) and also added to CollectionsIndex+ (as described above). Bank or payment information details are processed by Middlesex University's Finance department.

What we collect	Why	Legal Bases
Your name, company name, contact address, e-mail address, telephone number	In order to answer your queries or if we have questions in regards to your agreement.	In order to fulfil an agreement or contract.
Financial information	In order to process payment to us.	In order to fulfil an agreement or contract.

## **V. Sharing Information**

We do not disclose personal data to any third parties or external organisations, other than companies carrying out work on our behalf – these are called data processors. We retain responsibility for your data and ensure that these organisations only act on our instructions.

Examples of when we share data:

- Email marketing services (eg Mailerlite)
- Online shop
- Online monetary donations

We may occasionally need to transfer your personal information overseas, for instance to our email marketing provider, Mailerlite. We ensure any transfers of data are secure, in accordance with best practice, and in compliance with the General Data Protection Regulation. You can read the Mailerlite Privacy Policy [here](#). Your data will never be sold or passed to any third party for any other purpose.

## **VI. Information Security**

We ensure that we have appropriate security measures in place to prevent the loss, misuse or alteration of your information.

### **Access**

We have robust processes, procedures, contracts and agreements in place to ensure secure collection, storage and processing of personal data. Only authorised employees, Consultants and third-party data processors (e.g. those who process data on our behalf) have access to personal data we hold. We change passwords on third party platforms regularly and share them only with current staff

### **Security**

Personal data is stored securely on our network, on encrypted devices and within third party systems (e.g. bulk email distribution platform) whose tools we use to process data.

## **International transfer of data**

Prior to engaging or using third party systems to process data, we ensure that sufficient safeguards, contracts/agreements are in place to protect personal data and that all parties comply with the requirements of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

For example, where data may be transferred outside of the UK to a country that does not have an adequacy decision, for example, to the United States (e.g. if a third party uses multiple servers to back up data), we will ensure that the third party has additional safeguards in place, such as additional contractual clauses.

## **VII. Your Rights**

Under the GDPR you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications.
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

To exercise any of the above rights please get in contact with us: [moda@mdx.ac.uk](mailto:moda@mdx.ac.uk)

You also have the right to complain to the UK Regulator the Information Commissioner's Office (ICO) if you believe your request has not been dealt with properly or you have a complaint to raise against the Museum for any other data protection related issue. A complaint can be raised via the [ICO's website](#) or by calling 0303 123 1113.

**You also have the right to withdraw consent from the processing of your personal data by the University at any time, if your consent was sought initially to use your personal data.**

## **VIII. Complaints**

If you would like to find out more about how we process data, or if you would like to make a complaint, please contact us at [moda@mdx.ac.uk](mailto:moda@mdx.ac.uk)