

THE PURELAND FOUNDATION LIMITED - PRIVACY NOTICE

1. INTRODUCTION

- 1.1. This privacy notice (**Privacy Notice**) sets out the ways in which we, The Pureland Foundation (**The Foundation, we, us, our**), collect and use your personal data (your personal information) in connection with our business supporting charitable endeavours which aim to promote social inclusion, spiritual and emotional wellbeing. It also explains what rights you have to access or change your personal data.
- 1.2. You may first encounter our business through a meeting or correspondence with Mr Wang, the founder of The Pureland Foundation, or the Bruno Wang Private Office, or you may have attended an event hosted by The Foundation such as The Pureland Series or asked to join The Foundation mailing list.
- 1.1. Our website and services are not intended for children. We do not knowingly collect or maintain the personal information of children under the age of 18. If you are under the age of 18, please do not access our website at any time or in any manner. We will take appropriate steps to delete the personal information of persons under the age of 18.

2. ABOUT US

- 2.1. We are a company registered in England under company number 09581857, with our registered address as set out below. We are also a registered charity (registered charity number 1165112).
- 2.2. You can contact us as follows:

FAO: Private Secretary to the Bruno Wang Private Office

Address: The Pureland Foundation, Hanover House, 14, Hanover Square, London, United Kingdom, W1S 1HP

Email: privacy@purelandfoundation.com

3. INFORMATION WE MAY COLLECT ABOUT YOU

3.1. Information that you provide to us.

- 3.1.1. We will collect any information that you provide to us when you:
 - 3.1.1.(a) submit correspondence to us by post or email;
 - 3.1.1.(b) correspond with, hold a meeting with or provide your business card to Mr Wang or the Bruno Wang Private Office;
 - 3.1.1.(c) ask to join our mailing list to receive our newsletter and event invitations;
 - 3.1.1.(d) register to and/or attend our events including as part of the Pureland Series or other art, music, performing arts or wellbeing event;
 - 3.1.1.(e) apply for a grant or other funding from The Foundation;

3.1.1.(f) make an enquiry, provide feedback or make a complaint over the phone or by email;

3.1.1.(g) submit a CV; and

3.1.1.(h) 'follow', 'like', post to or interact with our social media accounts, including Facebook, Linked In and Youtube.

1.1.1. The information you provide to us will include (depending on the circumstances):

(a) **Identity and contact data:** title, names, addresses, email addresses and phone numbers; and

(b) **Financial Data:** if you apply for a grant or other funding from The Foundation you may also provide payment details, which may include billing addresses and bank account details.

1.2. Information we collect about you:

1.1.1. **Information contained in correspondence:** we will collect any information contained in any correspondence between us. For example, if you contact us by email or telephone, we may keep a record of that correspondence; and

1.2.1. **Website usage and technical data:** we will also collect certain information about how you use our website and the device that you use to access our website, even where you have not created an account or logged in. This might include your geographical location, device information (such as your hardware model, mobile network information, unique device identifiers), the data transmitted by your browser (such as your IP address, date and type of the request, content of the request regarding the specific site, time zone settings, access status/HTTP status code, volume of data transmitted, browser type and version, language settings, time zone settings referral source, length of visit to the website, date and time of the request, operating system and interface) number of page views, the search queries you make on the website and similar information. This information may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies or similar technologies. For more information on cookies please read the **COOKIES** section below.

Sensitive information

1.1. **"Special categories"** of particularly sensitive personal information require higher levels of protection. Special categories of data include 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. Depending on the circumstances we will also collect information about criminal convictions and offences as described in more detail below.

1.2. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

1.3. If you attend an event we will collect information about your dietary requirements and any special access requirements (on the basis of your explicit consent).

1.4. Information we receive from third parties

- 1.4.1. In certain circumstances, we will receive information about you from third parties. For example:
- 1.4.1.(a) **Service providers:** we may collect personal information from our website developer, IT support provider and marketing service provider and public relations agency (who may be based inside the EU);
 - 1.4.1.(b) **Website security:** we will collect information from our website security service partners who are based inside the EU, about any misuse to the website, for instance, the introduction of viruses, Trojans, worms, logic bombs, website attacks or any other material or action that is malicious or harmful; and
 - 1.4.1.(c) **Social media plugins:** we currently use social media plugins from the following service providers who are based both inside and outside the EU: Facebook, Linked In and Youtube. By providing your social media account details you are authorising that third-party provider to share with us certain information about you.
- 1.4.2. We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

2. HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION

2.1. We will use your information for the purposes listed below either on the basis of:

- 2.1.1. performance of your contract with us and the provision of our services to you;
- 2.1.2. your consent (where we request it);
- 2.1.3. where we need to comply with a legal or regulatory obligation; or
- 2.1.4. our legitimate interests or those of a third party. Where we refer to using your information on the basis of our “legitimate interests”, we mean our legitimate business interests in conducting and managing our business and our relationship with you as more particular set out below.

2.2. Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing please refer to details of “**Your Rights**” below.

2.3. We use your information for the following purposes:

- 2.3.1. **To provide access to our website:** to provide you with access to our website in a manner convenient and optimal to you including sharing your information with our website hosts and developers (on the basis of our legitimate interest to ensure our website is presented in an effective and optimal manner);

- 2.3.2. **Relationship management:** to manage our relationship with you, which will include notifying you about changes to our terms of use or Privacy Notice, and asking you to leave a review or take a survey (on the basis of performing our contract with you, to comply with our legal obligations and on the basis of our legitimate interests to keep our records updated and study how our website and services are used);
- 2.3.3. **Recruitment:** if you submit a CV to us we will pass it to Mount Tai Limited or any other relevant employment entity, depending on the role applied for. That entity will provide you with their own Privacy Notice;
- 2.3.4. **Invitations to events:** to invite you to our events such as the Pureland Series or other art, music, performing arts or wellbeing events (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so);
- 2.3.5. **Marketing:** to keep in contact with you about our news, new blogs and events that we believe may interest you, provided that we have the requisite permission to do so, and sharing your information with our marketing services provider (MailChimp) (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so);
- 2.3.6. **Social media interactions:** to interact with users on social media platforms including Facebook, Linked In and Youtube, for example, responding to comments and messages, posting and 'liking' posts (on the basis of our legitimate interest in promoting our brand and communicating with interested individuals);
- 2.3.7. **Analytics:** to use data analytics to improve our website, products/services, marketing, customer relationships and experiences (on the basis of our legitimate interests in defining types of customers for our website and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy);
- 2.3.8. **Research:** to carry out aggregated and anonymised research about general engagement with our website (on the basis of our legitimate interest in providing the right kinds of information and services to our website users); and
- 2.3.9. **Compliance with policies, procedures and laws:** to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so).

3. WHO WE MIGHT SHARE YOUR INFORMATION WITH

- 3.1. In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we will share your personal information when relevant with third parties such as:
 - 3.1.1. **Our service providers:** service providers we work with to deliver our business, who are acting as processors and provide us with:
 - 3.1.1.(a) website development based in Italy and hosting services based in France;

- 3.1.1.(b) IT, system administration and security services based in Italy;
- 3.1.1.(c) marketing and advertising services including MailChimp (based in the USA) and Paperless Post (based in the USA); We also use the Google AdWords service and Google Analytics services based in the USA;
- 3.1.1.(d) public relations services provided by First Word Media (based in the UK);
- 3.1.1.(e) social media plugin services including Facebook, Linked In and Youtube based in the USA; and
- 3.1.1.(f) legal, accountancy, auditing and insurance services and other professional advisers based in the United Kingdom.

3.1.2. **Employment entity:** the employment entity as described under paragraph 4.3.3 above;

3.1.3. **Prospective sellers and buyers of our business:** any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets; and

3.1.4. **Other third parties (including professional advisers):** any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) based in the United Kingdom where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

3.2. We require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

4. COOKIES

4.1. We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of the software and simplify your use of the website.

3.2. If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the website.

6.3 The names of the cookies used on our website and the purposes for which these cookies are used are set out in the table below:

Cookie Name	Purpose	Duration
_ga	[analytics]	2 years
_gid	[analytics]	2 years

wordpress_[session hash]	[authentication]	session
wordpress_logged_in_[session hash]	[authentication]	session

- 1.1. Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the relevant third party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

7. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

- 7.1. We look for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

- 7.1.1. ensuring the physical security of our offices or other sites;
- 7.1.2. ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
- 7.1.3. maintaining a data protection policy for, and delivering data protection training to, our employees; and
- 7.1.4. limiting access to your personal information to those in our company who need to use it in the course of their work.

- 3.3. We will retain your information for as long as we reasonably require for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are required by law to retain such information. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example,

- 3.3.1. we archive our email and paper correspondence regularly and destroy information older than 4 years;
- 1.1.1. we retain information about your dietary requirements and any special access requirements relevant to your attendance at our events until you stop attending our events or until you ask us not to hold such information any longer;
- 3.3.2. we retain website and technical data for approximately 2 years; and
- 3.3.3. we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes we must store this information permanently.

4. INTERNATIONAL TRANSFERS OF YOUR INFORMATION

- 4.1. Our company is located in the UK.

- 4.2. Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.
- 4.3. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following transfer solutions are implemented:
- (a) we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#);
 - (b) where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, [European Commission: Model contracts for the transfer of personal data to third countries](#); and
 - (c) where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).
- 4.4. Please contact us using the contact details at the top of this Privacy Notice if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

5. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

- 5.1. You have certain rights in respect of the information that we hold about you, including:
- 5.1.1. the right to be informed of the ways in which we use your information, as we seek to do in this Privacy Notice;
 - 5.1.2. the right to ask us not to process your personal data for marketing purposes;
 - 5.1.3. the right to request access to the information that we hold about you;
 - 5.1.4. the right to request that we correct or rectify any information that we hold about you which is out of date or incorrect;
 - 5.1.5. the right to withdraw your consent for our use of your information in reliance of your consent, which you can do by contacting us using any of the details at the top of this Privacy Notice;
 - 5.1.6. the right to object to our using your information on the basis of our legitimate interests (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;
 - 5.1.7. the right to receive a copy of any information we hold about you (or request that we transfer this to another service provider) in a structured, commonly-used, machine readable format, in certain circumstances;

- 5.1.8. in certain circumstances, the right to ask us to limit or cease processing or erase information we hold about you; and
- 5.1.9. the right to lodge a complaint about us to the UK Information Commissioner's Office (<https://ico.org.uk/>) as well as a right to lodge a complaint with the relevant authority in your country of work or residence.

5.2. **How to exercise your rights**

- 5.2.1. You may exercise your rights above by contacting us using the details at the top of this Privacy Notice, or in the case of preventing processing for marketing activities also by clicking on the unsubscribe link at the bottom of any such marketing emails.
- 5.2.2. Please note that we may need to retain certain information for our own record-keeping and research purposes. We may also need to send you service-related communications even when you have requested not to receive marketing communications.

5.3. **What we need from you to process your requests**

- 5.3.1. We may need to request specific information from you to help us confirm your identity and to enable you 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.
- 5.3.2. You will not 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. We will 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.

6. **SHARING DATA DIRECTLY WITH THIRD PARTIES**

- 6.1. You might end up providing personal information directly to third parties as a consequence of your interactions with our website and other services offered by us. For example, you may attend an event hosted by us where you communicate personal information directly with other attendees. We are not responsible for how such third parties use personal data provided by you.
- 6.2. Please be responsible with personal information of others when using our website and the services available on it. We are not responsible for your misuse of personal information, or for the direct relationship between you and others when takes place outside of the website or our services.

7. **THIRD-PARTY LINKS**

- 7.1. The website may include links to third-party websites, 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 notice of every website you visit.

8. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

- 8.1. We may make changes to this Privacy Notice from time to time. We will post any changes to our site, or notify you of any material changes by e-mail.
- 8.2. 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 by updating your profile account information or contacting us via the contact details at the top of this Privacy Notice.

This Privacy Notice was updated on 24 March 2018.