

# Freedom of the City - Privacy Notice

The City of London is committed to protecting and respecting your privacy when you provide your information while applying for the Freedom of the City of London and storing your application once complete. Your information will be sent to the London Metropolitan Archive following your admission to the Freedom of the City of London where the Freedom admission papers will not be available for general access by researchers and have a 79-year closure in operation.

This Privacy Notice explains how we use information about you and how we protect your privacy. If you have any concerns or questions about how we look after your personal information, please contact the City of London's Data Protection Officer, also the Comptroller and City Solicitor, Michael Cogher, at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk).

Please note - this Privacy Notice was updated on 3<sup>rd</sup> of April 2023.

## 1. Your personal information

Personal information is anything that directly or indirectly identifies and relates to a living person, such as a name, address, telephone number, date of birth, your gender, age, how the application was made etc. etc.

Some personal information is special category data and needs more protection due to its sensitivity. This includes any information about an identifiable individual that can reveal their sexuality and sexual health, religious or philosophical beliefs, racial origin, ethnicity, physical or mental health, trade union membership, political opinion, genetic/biometric data. Personal information relating to criminal offences and convictions, although not 'special category data', is still sensitive in nature and merits higher protection.

All personal data collected will be evaluated periodically and only kept as long as necessary or in line with legal requirements.

## 2. Why do we need your personal information?

We will collect and process the following data about you:

- To administer the process of the Freedom of the City.
- To respond to any correspondence received from yourself.
- We may ask you about your access requirements.

- To send you communications by electronic means (emails) in relation to administering and sending relevant communications in reference to the Freedom of the City process,
- To run background checks on your eligibility to be admitted to the Freedom of the City of London, whereby a series of checks will be conducted referring to Google, Facebook, LinkedIn, Twitter, Companies House, etc.
- To process information, we receive from other sources (Third Party Information). As we are working closely with third parties (including, for example, Livery Companies), we will notify you when we receive information about you from them and the purposes for which we intend to use that information.
- For archiving, historical research, or statistical purposes.

### **3. How the law allows us to use your personal information**

There are several legal reasons why we will need to collect and use your personal information in different circumstances.

Generally, we collect and use personal information where:

- it is necessary for the performance of a task carried out in the public interest.
- it is required by law.
- you have made your information publicly available, e.g. on Google, Twitter and LinkedIn
- it is necessary for archiving, historical research, or statistical purposes.

### **4. Consent**

If we have consent to use your personal information for any particular reason, you have the right to remove your consent at any time. If you want to remove your consent, please contact [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk) and tell us which service you are using, so we can deal with your request.

### **5. Your rights regarding your personal information**

The law gives you a number of rights in relation to what personal information is used by the City of London, and how it is used. These rights are listed below, and full details can be found in the [City of London's Data Subject Rights Policy](#).

#### Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such

purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk)

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

You can ask us to:

- provide you with a copy of the personal information that we hold about you;
- correct personal information about you which you think is inaccurate;
- delete personal information about you if you think we no longer should be using it;
- stop using your personal information if you think it is wrong, until it is corrected;
- transfer your personal information to another provider in a commonly used format;
- not use automated decision-making processes to make decisions about you.

## 6. Who do we share your personal information with?

In some circumstances, we use other organisations to either store personal information or use it to help deliver our services to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with data protection law.

Please note that we will also share your data with the Livery Companies – but only in instances where the applicant of the Freedom is a member of that company.

Sometimes we have a legal duty to provide personal information to other organisations.

We may also share your personal information when we consider/believe that there is a good reason to do so, which is more important than protecting your privacy. This doesn't happen often, but in these circumstances, we may share your information:

- to find and stop crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals;
- to protect a child; or
- to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them.

For all these reasons, the risk must be serious before we can override your right to privacy.

If we are worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we will discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

We may still share your information if we believe the risk to others is serious enough to do so.

If this is the case, we will make sure that we record what information we share and our reasons for doing so. We will let you know what we have done and why, if we think it is safe to do so.

If you have submitted an application for the Freedom of the City please note that your data will be shared with Stopford Information Systems Limited as the supplier for the software used to maintain and administer our records. You can access their full privacy policy here: [Privacy Policy | Stopford Information Systems](#).

## **7. How do we protect your personal information?**

We have a legal duty to make sure we hold your personal information (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password).
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Training for our staff allows us to make them aware of how to handle personal information, and how and when to report when something goes wrong

You can find more details of our Information Security expectations in our IT Security Policy.

## **8. Where we store your personal data**

The data that we collect from you will be held within the UK unless we are required to process your data outside of the UK. For example, if the Freedom Certificate needs to be sent to an address based outside of the UK.

All data held and processed within the UK will be processed by staff who work for us or for one of our providers.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to Our Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will collect and store personal data on your Device using application data caches and other technology.