

## Privacy Policy Notice

This privacy policy notice is for this website; [www.charlesede.com](http://www.charlesede.com), and served by Charles Ede Ltd. of 1 Three Kings' Yard, London, W1K 4JP and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

### Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [Charles Ede].
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a users computer or device.

### Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- We are registered with the ICO under the Data Protection Register, our registration number is: Z6829655
- In the event of any transaction regarding an item of stock (purchased or sold) Charles Ede will retain the client's data indefinitely in order to comply with our legal obligation and legitimate interest to ensure the diligent recording of our antiquities' provenance. Our legal obligation and legitimate interest are governed by the UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property (1970), the UK Treasure Act (1996), the UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects and Other International Legal Instruments on Illicit Trade (1995), Protocol to the Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict (1954), as well as all other international and domestic laws relevant to the trade in ancient art.
- In the event of any Data Subject presenting items to Charles Ede for potential valuation, purchase, consideration, or comment, we will retain their data indefinitely in order to comply with our legal obligation as well as vital public interest to ensure the item's legal location on the market both in the present and future. Data may be shared with representative third parties of law enforcement, the judiciary, or related bodies in the case of illegality or suspected illegal activity on behalf of the client.

- Any Data Subject that has entered into a contractual relationship with Charles Ede may be marketed to in accordance with the Privacy and Electronic Communications (EC Directive) Regulations (2003)
- Data Subjects have the right to amend or request erasure of their data if it does not contradict our obligations as set out in sections 2.1 and 2.2. Any request should be addressed to the Data Protection Officer and a response should be given within 30 days of the request.
- A six-month data audit will be undertaken by the Data Processing Officer to determine the current state and relevance of stored data.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

### Your individual rights

Under the GDPR your rights are as follows. You can read more about [your rights in details here](#);

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [[www.ico.org.uk](http://www.ico.org.uk)] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

### Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

### Email marketing messages & subscription

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing

messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also [unsubscribe from all MailChimp lists](#), by following this link, otherwise contact the EMS provider.

Our EMS provider is; [name of provider here]. We hold the following information about you within our EMS system;

- Email address
- I.P address
- Subscription time & date
- First and last name