

# Project Arts Centre – Privacy Policy

Project Arts Centre is committed to protecting your privacy. It is important that you know exactly what we do with the personal information you and other provide to us, why we gather it, how we will look after it and your rights in relation to its processing. This document is intended to explain this, however if you have any further questions please feel free to contact us directly at <u>dataprotection@projectartscentre.ie</u>

Any personal information that you volunteer to Project Arts Centre will be treated with the highest standards of security and confidentiality, strictly in accordance with the General Data Protection Regulation (2018).

### Purpose of site

This website is designed, created and coordinated by Project Arts Centre to promote and inform you about our work.

You are also able to purchase tickets for events and products online through our ticketing partner, Ticketsolve, who acts as a data processor on behalf of Project Arts Centre. For the purpose of making a purchase we collect information presented by the consumer in relation to transactions such as name, address, contact details and payment information.

The website contains links to other sites not controlled or operated by Project Arts Centre. Project Arts Centre is not responsible for the privacy policies of websites that it does not control or operate.

## The information we collect about you

We use the information we collect about you to help administer our business and the services we provide to you in accordance with the General Data Protection Regulation of 2018.

Information is collected in a number of different ways. Through in person contact with our staff, over the phone, online through our website or in writing by email or post.

We routinely collect data about you when you place an order, become a member, subscribe to our newsletter, complete a survey or apply for employment. We also use cookies on our website that allow us to gather technical information about visitors to our website

It is our policy never to share your information to any third party other than those data processors engaged by us to provide the services as outlined in this privacy policy.

Data Protection law recognises that certain categories of personal information are more sensitive such as health data, biometric data, genetic data, sexual orientation and religious beliefs. We do not collect this type of information about our patrons.

We take privacy seriously and endeavour to be as open as possible in terms of how your information is used. We will never sell your information or disclose it to external parties unless obliged to by the rule of law.

## The information you give us and how we process it

### • Purchases & orders

When you purchase tickets, products or make a donation through our Box Office (in person, over the phone or online) your name, address data, email and contact number will be stored in our Box Office system, Ticketsolve. We will retain your data for no longer than 4 years from the date of your last purchase. If you wish for your personal information to be destroyed before this you can contact us directly at <u>dataprotection@projectartscentre.ie</u>. Any credit card payments made online, over the phone or in person are securely processed via Realex (phone or online) or Bank of Ireland merchant services (in-person sales). Your details are input using portals provided by, processed and retained by these third-parties purely for the purpose of completing that transaction. Credit card details are not stored or accessible to Project Arts Centre once processed.

### • Email newsletter

When you sign up for our e-newsletter online your name and email address will be stored by our software provider, Mailchimp. If you choose to opt in for our e-newsletter at point of purchase your email address and consent will be stored in our Box Office system, Ticketsolve, and subsequently added to and stored by Mailchimp. You may unsubscribe or update your settings for email contact at any time using the links at the bottom of our e-newsletters, or by emailing <u>dataprotection@projectartscentre.ie</u>.

### • Memberships

When you sign up for a membership scheme at Project Arts Centre your name, address data, email and contact number will be stored in our Box Office system, Ticketsolve. Payments will be processed through Realex / Bank of Ireland merchant services, as outlined for purchases above. Your contact information will also be transferred to Insightly, the system we use to manage our membership database and deliver emails, offers, benefits and invitations related to your membership. We will retain your data for no longer than 4 years from the date of your last membership. If you wish for your personal information to be destroyed before this you can contact us directly at <u>dataprotection@projectartscentre.ie</u>.

### • Information about your online interactions with us

When you visit our website, we collect information about how you interact with our content. When we send you an e-newsletter mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on.

### Other processing activities:

### • CCTV

Project Arts Centre operates CCTV on the premises for the security and well-being of our staff, patrons and building. CCTV footage is retained for a period of 3 months and is then destroyed. This data will only be shared with An Garda Siochana if requested in relation to a suspected criminal matter.

### • Video & Images

Project Arts Centre take photographs & video footage during public events in the building where audiences may on occasion be identified. On these rare events the public will be informed by signage that photographs are being taken but it is up to the individual to inform our staff if there is an issue. If an individual is asked to pose for a photograph they will be asked for their consent by the photographer and informed what the image may be used for. Photographs will be used for the Project Arts Centre's website, social media networks and other promotion purposes unless otherwise stated.

### How we protect your data

We have in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible.

Our policies and procedures limit access to your information to only those employees who need to come into contact with it, to provide products and services to you.

We also work with trusted third party platforms to store and process your data and have Data Processing Agreements in place with these third parties.

Some of the platforms we use may transfer the data that we collect from you to be stored at a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for them for the provision of support services. However we have carefully selected these platforms for their commitment to the security of your data and their ability to demonstrate compliance with 2018 GDPR legislation.

## Legal Basis

There are three bases under which we may process your data:

### Contract purposes

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of cancellation of an event, or in the case of problems with your payment. We will also email you a confirmation of your online booking.

### • Consent

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. We use consent as the legal basis for marketing communications by email and are committed to never sending marketing communications to you unless you have given your consent to receive this information.

### • Legitimate Interest

We use Legitimate Interest as the basis for a number of our processes. This applies to activities for which we have determined the processing is necessary for our legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

## What processes do we use the Legitimate Interests legal basis for?

• Online Advertising

For customers with whom we have an existing relationship, and who have consented to contact from us, for example through accepting cookies or subscribing to our mailing list, we have deemed Legitimate Interest to be the basis by which we can tailor targeted online advertising campaigns to them. We have deemed that this processing, with third-parties with whom we have agreements in place, does not out-weigh the minimal impact on the rights of the individual involved.

### • CCTV

Project Arts Centre operates CCTV on the premises for the security and well-being of our staff, patrons and building.

### • Postal Marketing

Project Arts Centre rarely engages in postal marketing but in circumstances where it is deemed appropriate it will be undertaken only to this with similar events and purchases within the previous 18 months.

### • Invitation lists

For invitations to our database of professional and industry contacts, stakeholders and members of the press and media.

## • Fundraising and development

Research using publicly available information in relation to corporations, governing bodies and other professional contacts.

## • Archive

Project Arts Centre maintains records of its professional work and practice in an historical archive at the National Library of Ireland and on site until such time as the library is ready to receive and process the inventory. Identifiable data will be minimised.

Any individual can object to be included in legitimate interest based processing at any time. If you wish to make an objection please contact us directly at <u>dataprotection@projectartscentre.ie</u> so that we can update our records.

### **Cookies**

This site uses cookies - small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at <u>the About Cookies website</u> which offers guidance for all modern browsers

This website also uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the Project Arts Centre website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

You can set preferences for how Google advertises to you using the <u>Google Ad</u> <u>Preferences page</u>, and if you want to you can <u>opt out of interest-based advertising</u> <u>entirely by cookie settings</u>.

We currently operate cookies on the basis of 'consent by implication'. This means that once you are informed of our use of cookies, by continuing to use the website that you consent to the processing of data about you in the manner and for the purposes set out in this privacy policy.

## Your Rights

You have many legal rights when it comes to the personal data you provide to us. In line with GDPR and the Data Protection Act 2018 you have the right to:

## • The right of access

You have the right to access your personal data which is held by us. If you wish to exercise your right of access you can do so by making a **Subject Access Request**. **Requests** should be made in writing to <u>dataprotection@projectartscentre.ie</u>, you will be asked to complete a <u>Subject Access Request Form which can be downloaded here</u> and also to provide proof of identity before we supply the data to you. We will endeavour to deliver the data to you within 30 days of the request.

### • The right to correction

If you discover that the data we hold about you is incorrect or incomplete, you have the right to have the data corrected. If you wish to have your data corrected please contact us at <a href="mailto:dataprotection@projectartscentre.ie">dataprotection@projectartscentre.ie</a> and we will update the information.

## • The right to be removed

To have your information deleted from our records – Unless there is a compelling legal basis for us to retain your data, you can ask us to delete your information at any time by emailing <u>dataprotection@projectartscentre.ie</u>

## • The right to object to direct marketing

You have the right to ask us not to process your personal data for marketing purposes. Email marketing will only ever take place if we have had consent from you for that purpose. You can unsubscribe from email marketing at any time via the links at the bottom of every email. Or you can email <u>dataprotection@projectartscentre.ie</u> or call 01 8819 613.

# • The right not to have automated decisions made about you

You have the right not to have decisions made about you solely on the basis of automated decision making processes where there is no human intervention, where such decisions will have a significant effect on you. However, Project Arts Centre does not currently make any decisions based on such processes.

You have the right to lodge a complaint with Data Protection Commissioner. <u>You can find</u> more information about how to make a complaint to the commissioner here.

## Updates to Privacy Policy

This policy will be fully audited every 12 months to ensure continued compliance with regulations. It may also be updated from time to time without notice to reflect agreements with new third-party Data Processors or changes and development in the regulations.

If you have any questions or concerns about the way we handle your data please do not hesitate to contact us:

## By email: dataprotections@projectartscentre.ie

By post: Data Protection, Project Arts Centre, 39 East Essex Street, Temple Bar, Dublin 2