

Severn Arts Privacy Policy

This Privacy Policy explains the ways in which Severn Arts processes personal data.

Our responsibilities

Severn Arts, collects, processes and stores information, including some personal data, in order to deliver its services efficiently.

We are responsible for managing the personal data we hold and we recognise that this personal data is important to you. We take our responsibilities seriously and use personal data fairly, correctly and safely in line with the legal requirements set out by the General Data Protection Regulations (GDPR). Anyone who processes personal data on our behalf is also under a legal duty to do the same and, where relevant, has a set of data protection clauses included in their contract.

We keep our Privacy Policy under regular review. This Privacy Policy was last updated in February 2020.

Why we need your information

We will use your personal data for a limited number of purposes and always in line with our responsibilities, where there is a legal basis and in line with your rights under the GDPR.

We will process personal data:

- for the purpose for which you provided the information, e.g. to join our mailing list, to become a volunteer, to become an employee or supplier, to take part in face to face or online music lessons or arts activities
- to enable us to communicate with you and provide the services you need
- to monitor our performance in providing services to you
- to gather statistical information to allow us to plan future provision of services and to obtain your opinion about our services
- to meet various legal requirements – for example, you may be asked to provide us with medical information relating to your child if they attend our activities outside of a school day. We have a legal duty for the health and safety of children attending activities outside of school
- to enable us to perform statutory law enforcement functions and or for the prevention and or detection of crime, for example compliance with Keeping Children Safe in Education
- to process financial transactions including grants, payments and benefits directly involving us, for example from parents/carers, or where we are acting on behalf of other government bodies such as Arts Council England, Department for Education, Department for Digital, Culture, Media and Sport
- where it is necessary to protect individuals from harm or injury

- to promote the services we provide where you have given your consent for us to do so
- where it is permitted under GDPR, for example, to comply with legal obligations or for us to seek legal advice or undertake legal proceedings.

We may not be able to provide you with a product or service if we do not have enough information and, in some instances, your consent to use that information.

We aim to keep your personal data accurate and up to date. You can help us to do this at any time by letting us know if any of the information you have given us, such as your address, changes. Contact us on info@severnarts.org.uk for more details.

Ways in which we collect your information

Face to face

We may keep a record of your contact with us to assist us in the delivery and improvement of the services that we provide to you and to others. Any such records that include personal data will be kept securely.

Telephone calls

Ordinarily we will inform you if we record or monitor any telephone calls you make to us. We may do this to increase your security, so that we have a record of a call taking place and/or for training and quality purposes.

Emails

If you email us, or complete an online form, we may keep your email or online form as a record that you have made contact. This includes your email address.

Online - cookies

A cookie is simply a small text file. It isn't a program and doesn't actively do anything on your computer. As with many other websites, we use cookies for several reasons, the main ones being:

- to make your visit to our site smoother. So, for example, it remembers what you add to your itinerary or allows you to share content with friends on social networks. It also remembers your preferences and so allows us to customise our site according to your individual interests
- to monitor and measure what visitors do on our website. This allows us to know what areas of the site are popular, how often visitors come back, where they come from, whether they are using a PC or a mobile device and so on. Knowing how our site is being used means we can enhance users' experience in future.

Opting out of accepting cookies

Because of the way our website operates, cookies are needed to allow some of the functionality to work and therefore we recommend that you accept them.

However, if you choose to opt out of receiving our cookies, please understand that although you can still use our site, some functions may not work and your experience may not be as smooth or as enjoyable as we aim to deliver for all our users.

The cookies we use:

- **Necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. You can set your browser to block or alert you about these cookies, but some parts of the site may not work.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. All information these cookies collect is aggregated and therefore anonymous.

Online - other websites

On our website you may find links to other external websites which we have provided for your information and convenience. This Privacy Policy applies solely to Severn Arts website. We are not responsible for the content of those sites. When you visit other websites, we recommend that you take time to read their own privacy policies.

Purpose for processing and legal basis

Severn Arts processes participant, parent/carer, audience, volunteer, employee and supplier personal data in order to provide its services.

This includes the following examples:

- communicating with audiences in order to promote our Festivals programme and issue tickets for some events
- communicating with parents/carers in order to organise lessons, invoice for lessons, instrument hire or group membership, or send information (such as timetables) for rehearsals/performances
- collecting information for reporting and monitoring purposes e.g. evaluation of events or activities
- taking photographs for publicity and evaluation purposes, if people consent to this
- communicating with volunteers and suppliers to plan their involvement in the delivery of events

- paying staff and suppliers

Lawful basis

We will only process personal data where we have one of 6 'lawful bases' to do so under

Article 6 of the EU General Data Protection Regulations.

Most commonly:

- to fulfil a contract with the individual
- for the legitimate interests of Severn Arts (provided the individual's rights and freedoms are not overridden)
- where the individual (or their parent/carer when appropriate in the case of a child) has freely given consent (for example, to receive notification of and/or access to upcoming events, to have photographs taken)

And exceptionally to:

- comply with a legal obligation
- ensure the vital interests of the individual e.g. to protect someone's life
- perform a task in the public interest

Information collected

Personal data that we may process about individuals may include, but is not restricted to:

- your full name, title, date of birth, gender
- next of kin
- postal address, email address, phone number
- IP (internet protocol) address e.g. cookies
- emergency contact details and contact preferences
- ethnicity
- characteristics, such as special educational needs
- details of any medical conditions or dietary requirements
- attendance information
- safeguarding information
- details of any support received
- Gift Aid status
- payment card details (these are not stored)
- photographs and video recording

What we will do with your information

When deciding what personal data to collect, use and hold, we are committed to making sure that we will:

- only collect, hold and use personal data where it is necessary and fair to do so
- keep your personal data secure and safe
- securely dispose of any personal data when it is no longer needed
- be open with you about how we use your personal data and who we share it with; and
- adopt and maintain high standards in handling any personal data.

We may disclose personal data to a third party, but only where it is required by law, where that third party needs that information to provide you with a service on our behalf or where it is otherwise allowed under the GDPR. We will strive to make sure that the third party has sufficiently robust systems and procedures in place to protect your personal data.

How long we will hold your information

We will not keep your personal data any longer than needed to provide the services you require unless the law states the period that such records should be kept.

We follow Worcestershire County Council's disposal schedules which contain information about how long to keep different types of information. When we dispose of personal data we will do so in a secure way.

Who we may share your information with

Your personal data may be shared within Severn Arts or with external partners and agencies involved in delivering services on our behalf. They will only have access to your information if it is needed to provide you with a service or to comply with a legal/financial obligation. This does not mean that we share all the personal data you give us, only what is necessary for very specific purposes.

Your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

- your data will be made available to our website provider

- the data that may be available to them include any of the data we collect as described in this Privacy Policy
- our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA
- they will store your data for a maximum of 7 years
- this processing does not affect your rights as detailed in this Privacy Policy

Severn Arts will seek to ensure that the third party has sufficient systems and procedures in place to prevent the loss or misuse of personal information.

If your personal information is transferred outside the European Economic Area (EEA) for processing or storage purposes Severn Arts will ensure that safeguards are in place to protect it to at least the standard applied within the EEA.

Your information rights

Under the GDPR you, as the Data Subject, have the following rights. Each request will be reviewed and actioned wherever possible. However, you should be aware that, due to the reasons that Severn Arts may be processing your personal data, we may not be able to comply with some requests due to a legal obligation.

You have the right to:

- access the personal data we hold about you
- request that we rectify any personal data about you that is incorrect. Simple inaccuracies, such as address changes, will be made. However, depending on the purpose for processing, records (including statements and opinions) may not be changed, but there will be the option for you to provide a supplementary statement which will be added to the file
- request that records we hold about you are erased
- restrict processing of the personal data we hold about you if you have an objection to that processing, whilst your objection is investigated
- request that any personal data that you have provided to us is given back to you in a format that you can give to another service provider if required
- object to processing of your personal data including automated decision making and profiling
- make a complaint to a supervisory authority if you are not satisfied with how the personal data held about you has been handled

For any such requests please contact us on info@severnarts.org.uk

Use of personal information for marketing

We will only send you information about our services and/or products if you have opted in to receive them. We may also share your personal data with other service providers who may contact you with details of services they provide if you give us permission to do this. If you change your mind at any time contact us on info@severnarts.org.uk and let us know.

The prevention and detection of fraud

Severn Arts is required by law to protect the public funds it administers. Therefore, we may use any of the personal data you provide to us for the prevention and detection of fraud or to comply with the law.

As well as conducting our own 'data matching' exercises we may also share your personal data with other public bodies. These include (but are not limited to):

- The Audit Commission
- Department for Work and Pensions
- Local Authorities
- Her Majesty's Revenue & Customs (HMRC)
- The Police

We may also share information with credit reference agencies, service providers or contractors and partner organisations, where the sharing of information is necessary, proportionate and lawful.

How to access the information we hold about you

You have the right to request a copy of the personal data that we hold about you. If you would like to do so, please contact us by email or by post giving us as much detail as possible about the personal data you require.

We will need to confirm your identity before any information can be provided. You will then receive a copy of the personal data held about you along with an explanation of any codes used or other clarification that may be necessary.

Requesting that someone else look at your information on your behalf

You can request that someone else looks at your records on your behalf. To do this you will need to give us consent in writing informing us of who you want to look at the information for you. If a relative or someone else wishes to look at the records of a person who is not able to give their consent, this will only be allowed where it can be shown to be in the best interest of the person concerned.

How to contact us

To exercise any of your rights under the General Data Protection Regulations (GDPR) please contact us:

- by email – contact us on info@severnarts.org.uk
- by telephone – 01905 947300
- by post – Severn Arts, Suite 11, Malvern Gate, Bromwich Road, Worcester, WR2 4BN

If you are not happy with the response you receive from us, you have the right to make a complaint to a supervisory authority:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113

Equalities information

We may use personal data you give us such as your ethnic background, first language, gender, sexual orientation and age to gather statistics about the population of the area and the take up of our services. This is to help comply with our reporting obligations for the use of public money and to plan the provision of services in the future. Such analysis will not identify individuals or have impact on entitlement to services and facilities.