



Cromer Artspace Data Protection and Privacy Policy

1. Introduction

Cromer Artspace aims to help the arts in Cromer and surrounding area to grow and develop and to involve more people in the arts, to assist the arts community to succeed and pursue excellence and for the arts to be valued as a vital part of community life.

Cromer Artspace is committed to protecting everyone's privacy and data. We will use any information that we collect in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003. This policy sets out the ways in which we collect, store and use data and how people can hold us accountable for that. We aim to respect and take care of all personal information and not to keep information we do not need. No member of Cromer Artspace will use data collected by the group for personal purposes.

2. Definitions

- a. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.
- b. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.
- c. Any data subject is any person whose data we collect, store and use for purposes detailed in this policy.

3. Principles

Before personal information is collected, we will consider why it needs the information, how much information will be required and how it will be used. In line with legislation and Data Protection principles, we will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date



- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures

4. Responsibilities for data protection and privacy

- a. Overall and final responsibility for data protection lies with the trustees, who are responsible for overseeing activities and ensuring this policy is upheld.
- b. All staff, volunteers, contractors, agency staff and trustees are responsible for observing this policy, and related procedures, in all areas of their work for the group.

5. Why we collect data

- a. We will only collect, store, and use data:
 - for purposes for which the individual has given explicit consent,
 - for purposes that are in our groups' legitimate interests,
 - to fulfil contracts,
 - to comply with legal obligations,
 - to protect someone's life.
- b. We need to keep personal data about our trustees and committee members, volunteers, supporters, audience members and participants in order to carry out group activities.
- c. We may apply for funding from various sources to support our aim of helping the arts in Cromer and the surrounding area to grow and develop and to involve more people in the arts. Developing a better understanding of our audiences and supporters through their personal data allows us to make better decisions about activities and programming, fundraise more efficiently and report to our funders more effectively.
- d. We collect contact details when members of the public buy a ticket by phone or online via our website, sign up for one of our events, classes or workshops, take part in a survey or make a donation. We also keep details of those who sign up to receive emails from us. If people book a concessionary ticket, this will be noted in the customer record along with any specific needs of which we need to be aware.



- e. We will collect data from people who apply for jobs with Cromer Artspace and as keep records as part of their continuing employment with us e.g. payroll, pension, personnel records.
- f. We will collect data from people who apply for and take up volunteering roles with us.
- g. We may use specialist software to help us to manage our mailing list and event bookings. We may track whether mailing list recipients receive or open emails and other correspondence from Cromer Artspace.
- h. We only collect data for a specific purpose to fulfil our aims and do not store it when it is no longer relevant

6. The information we collect, store and use

- a. Information given to us, with explicit recorded consent and for a specific purpose. People will be asked to give their consent for the storage and use of their data for defined purposes, and wherever possible this will be in writing:
 - Name
 - Postal address
 - Telephone number
 - Email address
 - Ticketing history
 - Billing address information
 - Donation history and Gift Aid declaration
 - Preferences for how we communicate about our activities
 - Information that is available publicly
 - Film and photography consent for attendees at events, classes or workshops, where possible
 - Records of enquiries or complaints
 - Records of event attendance
 - Dietary Requirements for event catering
 - For people under 18, the name of their parent or guardian
 - Feedback on events and exhibitions
 - Where necessary we record health or disability information to ensure the accessibility of our services
 - We maintain a record of financial transactions, but we never store payment card numbers.



- b. We do not usually ask people to provide sensitive information, but may occasionally need to do so, for example, age and health, if booking for certain workshops or classes.
- c. We are committed to safeguarding children, young people and adults at risk, and do all we can to ensure that all who work with us are safe and inspired by their experience. For the details of children under 16, we will ask for the consent of a parent/guardian/teacher to provide such information. We will always require the carer's signature on similar documentation relating to adults at risk.
- d. As with all the personal information we hold, sensitive information is held securely and restricted to those who need to use it. We will delete information when we no longer need it.
- e. During the course of events, classes and workshops we may take photographs and video to document these for use on our digital platforms, printed materials and other promotional activity. This includes, but is not limited to, our website, social media channels, leaflets, posters and media releases. We will also share these images with relevant partners and artists relating to an event or activity to use for the same purposes. We will inform participants in exhibitions, activities or events that photographs will be taken or filming will take place and how images may be used e.g. on Social Media, website, press releases etc. People who do not wish their images to be used will be asked to let the organisers of the event or activity know. For anyone under 18 we will ask for written permission from a parent or guardian.

7. How we use the data we collect

We only collect, store or use the minimum amount of data needed for a specific purpose to fulfil our aims and do not store it when it is no longer relevant as follows:

a. Members of the public

- provide information about events or activities we think may be of interest,
- provide information about opportunities to support our work as a charity,
- provide tickets or respond to information requests,
- make contact about any important changes to bookings,
- administer ticket sales and donations,
- ensure we know how people prefer to be contacted, and their details are up to date,
- occasionally undertake research to help us understand how we can improve what we do. If we collect demographic information from people to assist

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with our research, this will be anonymised and stored separately from identifying data.

- meet legal obligations, to ensure people can contact trustees and to check criminal records of volunteers, using the Disclosure and Barring Service,
- fulfil a contract,
- save a life by sharing information with medical services.

b. Volunteers and Trustees

- keep in contact with volunteers in relation to their volunteering roles. People will be removed from the list if they have not volunteered for the group for 12 months.
- allow volunteers to work together to organise for the group. If this will involve sharing volunteer contact details with other volunteers, we will only do this with explicit consent.

c. Employees, sessional staff, contractors

We will only hold information about employees that are relevant to their employment with Cromer Artspace, including:

- Application details - applicants and successful applicants
- Bank details
- Health details
- Pension details
- Emergency contact details

8. How long data will be held for

- a. We will only hold personal data for as long as it is needed and we will delete or destroy safely any information we no longer use
- b. There are legal requirements about how long certain data should be stored e.g. payroll, pension. We are obliged to keep information about Gift Aid declarations, and the details of the person who made it, for six years. Once the period has expired, the data will be destroyed or removed.
- c. For data supplied as part of a job application to us, we will keep details for twelve months from date of appointment of successful candidate, then delete it.
- d. In our privacy notice we make clear the option to change any contact preferences at any time by contacting us.



9. Website, Cookies and Social Media

- a. The Cromer Artspace website is at <https://cromer-artspace.uk> and our Facebook page can be found under the user 'cromerartspace'.
- b. We use Google Analytics, to collect standard log information and details of visitor behaviour patterns on our website. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.
- c. If people leave a comment on our website, they may opt-in to saving their name, email address and website in cookies. These are for their convenience so that they do not have to fill in their details again when they leave another comment. These cookies will last for one year.
- d. If someone visits our login page, we will set a temporary cookie to determine if their browser accepts cookies. This cookie contains no personal data and is discarded when they close your browser. When they log in, we will also set up several cookies to save their login information and their screen display choices. Login cookies last for two days, and screen options cookies last for a year. If they select "Remember Me", their login will persist for two weeks. If they log out of their account, the login cookies will be removed.
- e. Social Media platforms have their own Privacy Policies which covers all use of that platform.

10. Third parties

- a. We will not share any personal details with any other third parties without explicit consent unless legally required to do so. Personal data is never sold on to any other agencies or companies
- b. Our website may contain links to and from the websites of other organisations. In our privacy notice, we explain that if following a link to any of these websites, viewers should note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

11. Safety and security of data

- a. Personal data will be held and processed on Cromer Artspace systems. Data is always held securely and access to information is strictly controlled.



- b. We may need to disclose details if required to the police, regulatory bodies or legal advisors.
- c. We store data on the cloud and we ensure that the systems we use to collect, store and use data e.g. Google Drive, Drop Box, We Transfer, and marketing software are compliant with the Data Protection Act and Data Protection Regulations. These companies have their own privacy policies.
- d. Where possible we aim to keep a single record for each person. In order to make sure that we manage data well, we have one central list of contacts managed by one person.
- e. We endeavour to keep personal data up to date and accurate.
- f. We will keep records of the purposes of collecting and holding data to ensure it is used only for these purposes.
- g. If a trustee or volunteer needs to use contact data they will ensure that their computer is password protected and has up-to-date anti spyware software.
- h. To uphold this policy we have developed Data Protection Procedures for our committee, staff and volunteers to follow (please see below).

12. Privacy and Data Protection Rights

- a. Everyone has the following rights related to personal data, which we uphold and respect:
 - The right to request a copy of personal information held about them (which we will provide within one month of the date of request, free of charge, unless the request is repetitive, unfounded or excessive.
 - The right to request that inaccuracies be corrected
 - The right to request us to stop processing personal data
 - The right to lodge a complaint with the Information Commissioner's Office (by calling 0303 123 1113, or emailing casework@ico.org.uk) or Fundraising Regulator (by calling 0300 999 3407, or emailing enquiries@fundraisingregulator.org.uk).
- b. Whenever we collect data we will provide information about why we collect data, how we collect, store and use data, and individuals' rights in relation to their data by providing a privacy notice.



13. Responding to a data breach

- a. We do everything we can to avoid data breaches, caused for example by theft of a laptop or a mistake in addressing an email.
- b. However if there should be a data breach, we will make every attempt to reclaim the data, we will inform the data subject and we will discuss how to avoid a repetition.
- c. We will report any serious breach to the Information Commissioner's Office.

14. Data Protection and Privacy Procedures

This policy is supported by Data Protection and Privacy Procedures for Cromer Artspace staff, contractors, volunteers, trustees and Committee members about the our expectation and the implementation of this policy.