

Creative Cullompton Privacy Policy

What is The Data Protection Act and GDPR?

The General Data Protection Regulation (GDPR) came into force in 2018 and is a legal framework which sets out guidelines for the collection and processing of personal information from individuals who live in the EU.

The Data Protection Act 2018 controls how your personal information is used and is the UK's implementation of GDPR.

Aim

Creative Cullompton is committed to protecting and respecting your privacy. We promise to keep your data safe and private, not to sell your data and to give you ways to manage your and review your data.

This policy sets out the basis on which any personal data we collect from you or that you provide to us, will be processed by. This policy seeks to ensure that Creative Cullompton processes personal data fairly and lawfully and in line with the Data Protection Principles.

Data Protection Principles

Creative Cullompton will ensure that all personal data will be:

- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Creative Cullompton will be able to demonstrate compliance with these principles and will have a process in place dealing with the following rights in respect of an individuals personal data:

- To being informed what data is held, why it is being processed and who it is shared with
- To access to relevant data
- To Rectification of records
- To Erasure

- To restriction of processing
- To data portability
- To object to processing
- Not to be subject to automated processing

What is personal data?

Personal data is any information relating to an identified or identifiable living person and includes name, contact details, identification number, online identifier such as a username.

More sensitive data includes: racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic information, biometrics, health – mental OR physical, sex life & sexual orientation.

Roles and Responsibilities

The Creative Cullompton Consortium Members are responsible for implementing good data protection practices and procedures within the delivery of the Creative Cullompton Programme.

It is the responsibility of all persons engaged in carrying out activities for Creative Cullompton, employed, self-employed or voluntary to ensure that their working practices comply with the Data Protection principles.

The nominated Creative Cullompton Consortium Data Protection Officer will have responsibility for all issues relating to the processing of personal data and will report to the Consortium.

The nominated Creative Cullompton Consortium Data Protection Officer will comply with responsibilities under the GDPR and deal with all SARS requests, requests for rectification, erasure, data security breaches.

The nominated Creative Cullompton Consortium Data Protection Officer is V. Westaway (Coach House Arts Ltd).

Information you may give us

You may give us information by paper, email, social media, phone, by contacting Creative Cullompton or one of the Consortium Members or by completing a survey or feedback form.

The information you give us may include your name, address, email contact details, phone number(s) and other information required by us to deliver our services.

Information we collect about you

When you visit our website, we may automatically collect the following information:

- Cookies (for more information see <https://www.walronds.com/privacy-policy/>)
- Information about your visit to our website including length of visit, which pages you viewed, download errors etc

Why do we collect information about you?

We need to collect and hold information about you for a variety of reasons including:

- The delivery of services and projects within the Creative Cullompton Programme
- Confirming your identity to provide some services
- Contacting you by post, email or telephone
- Understanding your needs to provide the projects/services required
- Understanding what we can do for you and inform you of other relevant services
- Obtain your opinion about our projects/services
- Help us build a picture of how we are performing
- Providing information by way of a newsletter
- Make sure we meet our statutory obligations including those relating to diversity and equalities

How will we use your information?

- To carry out our obligations arising from any contracts entered into between you and us to provide you with information, products or services that you request from us
- To monitor and improve the Creative Cullompton performance in responding to your request
- To allow us to be able to communicate with you and provide services and benefits appropriate to your needs
- To ensure that we meet our legal obligations
- Where necessary for law enforcement functions
- To prevent and detect crime
- To process financial transactions including payments, or where necessary to protect individuals from harm or injury
- To allow the statistical analysis of data to plan for provision of services
- For other legitimate business purposes

Photographs, Additional Personal Data and Consents

Where Creative Cullompton seeks consent for the processing of person data such as photographs at events it will ensure that appropriate consents are obtained, consent will also advise how the consent can be withdrawn. Where the personal data involves a person under 16 years consent will be required from the adult with parental responsibility.

How we will protect your information

The information you provide will be subject to rigorous measures and procedures to make sure it cannot be seen, accessed, or disclosed to anyone who shouldn't see it.

We will not keep your information for longer than it is needed, taking into account the following:

- Whether we have any legal obligations to continue to process your information (imposed by relevant law or regulation)
- The purpose(s) and use for your information both now and in the future (such as whether it is necessary to continue to store that information so we can continue to meet our obligations under a contract with you or a contract in the future)

- Where we have a legal basis to continue to process information (such as your consent)
- How difficult it is to ensure that the information can be kept up to date and accurate
- Any relevant circumstances (such as the nature and status of our relationship with you)

We will always dispose of paper records or delete electronic personal information in a secure way.

Sharing Data with a Third Party and Data Processing Undertaken on Behalf of Creative Cullompton

Personal data will only be shared with appropriate authorities and third parties where it is fair and lawful to do so. Where a third party undertakes data processing on behalf of Creative Cullompton, Creative Cullompton will ensure that there is a written agreement requiring that the data is processed in accordance with the Data Protection Principles.

All new persons employed by or engaged in work on behalf of Creative Cullompton will be made aware of the data protection requirements.

Internet/Emails/Social Media

Please remember that transmission of information over the internet is not secure. If you submit information to us via email, social media or by any other means you do so at your own risk.

If you email or message us on social media, we may keep a record of your contact and your email address as well as the email or message for our record keeping of the transaction. For security reasons we will not include any confidential information about you in any email or message we send to you. We would also suggest that you keep the amount of confidential information you send to us via email/message to a minimum.

When will we contact you?

We may contact you:

- In relation to any service or activity in order to ensure Creative Cullompton can deliver our services
- In relation to any correspondence we receive from you
- To invite you to participate in surveys about our programme so we can make improvement
- For marketing purposes – we will only send you marketing emails if you have agreed for us to do so
- We offer regular emails and newsletters to let you know about our services and you can opt in to receive these

Your Rights

You have the right to request that we stop processing your personal data in relation to any Creative Cullompton activities. Where possible, we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement.

You can legally ask to see any information we hold about you and get a copy. To do so, please contact the Creative Cullompton Consortium Data Protection Officer V. Westaway (Coach House Arts Ltd).

You have the right to be forgotten and may terminate your arrangement with us at any time, in which case we will permanently delete your record(s) and all data associated with it. To do so, please contact the Creative Cullompton Consortium Data Protection Officer V. Westaway (Coach House Arts Ltd).

We try to ensure that any information we hold about you is correct. There may be times where you find the information we hold is no longer accurate and you have the right to have this corrected.

Please contact us if you wish to exercise any of these rights, or if you have a complaint about how your information has been used. We will need to record your personal contact details to be able to respond to and track the progress of your request. Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce risk of identity fraud, identity theft or unauthorised access to your information.

If you feel that your data has not been handled correctly or you are unhappy with our response to any requests you have made, you have the right to lodge a complaint with the Information Commissioners Office.