



## **Privacy and Data Protection Policy**

This policy details how Freedom Festival Arts Trust (FFAT) collects, processes, stores and secures personal data.

We will always aim to be clear and transparent regarding all our requests for personal data and are legally bound to only use that data for the express purpose(s) agreed at the point the data is submitted to us.

Please note, customers are under no obligation to share personal data with us. However, the provision of certain pieces of personal data will help us to give our customers the best possible service we can.

This policy was last updated in May 2018 in accordance with the EU General Data Protection Regulation (GDPR).

For reference, GDPR is an EU law on data protection and privacy for individuals in the EU. It applies to any company processing personal data of EU citizens and aims to give EU citizens more control over their personal data.

### **What is Personal Data?**

Personal Data is anything that can be used to identify an individual directly or indirectly. In many situations this can be as simple as their name and contact details (such as address, phone number or email) but may sometimes include more detailed information depending on the nature of their engagement with us.

### **Data Definitions**

FFAT is legally defined as a **Data Controller**

Employees of FFAT are legally defined as **Data Processors**

The individuals FFAT engage with that provide personal data are legally defined as **Data Subjects**

### **When and How do we collect personal data?**

All of the following are common situations where we might request personal data from individuals:

- When purchasing tickets for our events
- When signing up to our mailing lists
- When signing up to any of our engagement, participation or volunteering programmes
- When submitting an application for a job at FFAT
- When becoming a supporter/member/donor

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We will always make it clear what data we are collecting from you during these transactions and why we are requesting it.

### **Information relating to volunteers and potential volunteers and participants**

We may collect personal information from you when you submit information about volunteering or becoming a potential volunteer and/or participant. This personal information may include but is not limited to the following information about you:

- your date of birth;
- your name (including your first name(s) and surname);
- your email address;
- your postcode;
- your phone number;
- other details about you that you or others provide to us; video footage of you; and photos of you.

We may also ask for or collect some non-personal information from you. Your personal information will only be used by us to:

- process your requests;
- respond to your questions or comments;
- provide or administer activities relating to Freedom Festival Arts Trust projects, in particular Volunteering Opportunities;
- provide you with information relating to Freedom Festival Arts Trust, the Website or our services, or that we feel may be of interest to you;
- maintain our organisational records;
- carry out research including evaluation carried out for us by another organisation or prepare reports; and
- supply your information to third parties as described below.

Any personal information that you provide when you register your interest in becoming a volunteer and or participant may be shared with third parties, including but not limited to:

- providers of support services to Freedom Festival Arts Trust, but only if the sharing of your personal information is necessary for the purpose of delivering the Programme;
- companies or organisations that are carrying out work on behalf of Freedom Festival Arts Trust, in relation to the Programme
- core funders who support and enable Freedom Festival Art Trust to deliver our programme of work



## **Website Data**

In addition, the following data may also be collected automatically when you visit our website:

- IP address
- Referring website (if you followed a link to get to our website)
- Web browser and device
- Cookies (see below)
- Time and date of visit
- Web pages visited
- Geographical location

This statistical data is collected with the express purpose of aiding our understanding of the areas of interest on our site and is kept only for as long as is required for this purpose.

## **Cookies**

A cookie is a small file which asks for permission to be placed on your device's hard drive. If you agree, the file is added and the cookie helps analyse web traffic or records when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

At FFAT we use cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to user needs. A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

All of the above are standard online identifiers which can be detected by Google Analytics – which, like many other organisations we use to monitor the activity on our website. Please visit Google Analytics Terms Of Service for further details.

## **Third party website links**

Our website and associated electronic communications may contain links to other websites not operated or controlled by us ("Third Party Sites"). The policies and procedures detailed in this policy do not apply to such sites. FFAT takes no responsibility for the content or data processing activities and policies of third party sites.



## **How we use personal data**

All personal data collected, processed and stored by FFAT is only collected with the prior notification of the scope and nature of the processing activity (i.e. how it will be used).

In relation to the personal data listed above, this will include 'Opt in' and/or 'Permission' on online forms regarding mailing lists, participation sign up or the provision of details on a job application or engagement with us contractually.

We may contact you about services which may be of interest to you but only if you opted to allow this at the time you provided us with your details.

If you no longer want us to use your data in this way please update your details by emailing us at [info@freedomfestival.co.uk](mailto:info@freedomfestival.co.uk)

## **Disclosure of your personal information**

We will only share your personal data with third parties where we are legally obliged to or for operational efficiency (e.g. dietary requirements) with a venue where we are holding an event.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **How we protect your personal information**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The transmission of information over the internet is not completely secure. We will do our best to protect your personal data, but we cannot guarantee the security of the data transmitted to this site and any transmission is at your own risk.

## **How long do we keep your personal information?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use

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or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Mailing List**

We use a third party provider, MailChimp, to deliver our newsletter. We use MailChimp software to help gather statistics on opening rates and clicks on links which help us monitor and improve our communications. Individuals can unsubscribe at any time from newsletters by clicking the unsubscribe link on each e-newsletter.

### **How do we store your personal data?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Stay in control of your information**

We respect the fact that your personal information is your information, and we'll make it easy for you to update or change your personal details or marketing permissions. Please help us to help you by letting us know if your contact details change or if you spot any errors in the information we hold about you.

### **Keeping your details up to date**

Please help us to keep your information up to date by emailing us at [info@freedomfestival.co.uk](mailto:info@freedomfestival.co.uk) if your personal information changes (i.e. if you move house or change your email address) or if you wish to correct it. We will endeavour to correct, update or delete information you have provided to us as quickly as possible.



## **Access to your information**

You also have the right to request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **Opting out**

You can ask us to stop sending you marketing messages at any time by emailing us on [info@freedomfestival.co.uk](mailto:info@freedomfestival.co.uk) and/or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of purchasing a product, membership, gift voucher or other transactions.

## **Right to be forgotten**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

## **Changes to this privacy policy**

We reserve the right to amend this privacy statement in the future. Any changes we make to this privacy policy will be posted on this page and where appropriate, notified to you by email.

## **Third Party Contractors**

In some instances we use established and accountable third party service providers who work on our behalf for the fulfilment of a contract we enter into

Examples include:

- Card payment processing of transactions relating to payment for goods and

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services (e.g. online ticket sales)

- Third party mailing houses, email providers (e.g. Mailchimp) and marketing agencies
- Our Website hosting and ticketing/CRM system providers
- Research Companies who help us to understand our audience to enable us to improve our service

Anyone who provides a service such as these on our behalf will enter into an agreement with us and will meet our data security standards. They will only use your data for the clearly defined service that they are providing on our behalf and are, in effect accountable in terms of complying with this policy

As FFAT is partially funded by Public Sector bodies (including the Arts Council and Hull City Council) we also need to provide a range of quantitative and qualitative data in order to support such funding. The majority of this data is anonymised and for the express purpose of meeting our conditions of funding.

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