

## **1. Introduction**

- 1.1. Learning Through The Arts is committed to protecting your privacy. We abide by GDPR guidelines and are registered with the Information Commissioner's Office.
- 1.2. This policy outlines how we collect, store and process your data and the security measures we have in place to keep it secure.

## **2. Who we are**

- 2.1. Learning Through The Arts is a registered Community Interest Company (CIC) (6023440) registered on the 8th December 2006, which works within the community to promote learning, creativity and skills development through the arts.
- 2.2. Learning Through The Arts' registered address is Unit 112, 186 St. Albans Road, Watford, WD24 4AS.
- 2.3. Under GDPR data protection legislation, Learning through The Arts acts as both a data controller and processor.
- 2.4. Learning Through The Arts' Creative Director takes overall responsibility for data protection compliance. If you have any questions regarding our privacy policy and practices, please contact our Creative Director, Ademola Adeniji by:

- writing to:

Learning Through The Arts, Clarendon House Business Centre, Shenley Road, Borehamwood, Herts, WD6 1AG

- calling on 07510 917517

- emailing [info@learningthroughthearts.co.uk](mailto:info@learningthroughthearts.co.uk)

## **3. What information we collect**

### **3.1. Non Personal Information**

3.1.1. We monitor how many people use our services. This includes details like exhibition attendance figures. None of this information is identifiable and it doesn't tell us anything about you. It just allows us to monitor and improve our services.

## 3.2. Personal Information

3.2.1. This information is collection in relation to specific services and provisions such as evaluation of our services, project reporting and marketing and promotion requests. This information may include your name, contact details, address, date of birth or photograph. You do not have to disclose any of this information to us, however it may affect the services we are able provide if you chose to withhold this information.

## 4. Where the information we collect comes from

4.1. The information we collect comes from you. By providing this information you are opting in and consenting to us using it for the purpose it is collected. This consent can be withdrawn, or changed at any time.

## 5. When we collect this information

5.1. We must have a legitimate reason and have identified a lawful basis for collecting and storing your personal data. We only do this when it is necessary and with legitimate purpose, or requested through consent.

5.2. We collect this information when:

- You leave your contact details when you visit one of our exhibitions
- You opt to fill out course/event/project evaluation forms
- You consent to photography or film and complete a consent form
- You complete a booking form for course/workshop attendance or registration
- You consent to be contacted regarding information on future services, specific to your request.
- You book a ticket using our online form, telephone or email
- You apply to become a volunteer or worker at Learning Through The Arts

## 6. What we do with the information we collect

6.1. Should we ask you to provide certain information by which you can be identified you can be assured that it will only be used in accordance with this privacy statement and for the purposes we have stated.

6.2. The information we collect is specific and relevant to the purpose for which it is collected. It is processed lawfully and retained only for as long as required for the purpose it was collected.

6.3. Dependent on the information you provide us with and the preferences you indicate, this information may be used to:

- Monitor and report on projects as required by funders, ensuring our services are being accessed by the intended recipients.
- Keep you updated on current and future services including course and workshop attendance, exhibitions and performances.
- Promote opportunities for volunteering and work experience.
- Monitor our user feedback to allow us to ensure quality and user satisfaction in our services.
- When Learning Through The Arts works in partnership with another organisation to deliver our programme, we may ask for your consent to share personal data with the partner organisation.

6.4. We may also need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

## **7. Website and Cookies**

7.1. A cookie is a file that places small amounts of information on to your computer when you visit certain areas of a website. A cookie often contains a unique number, which can be used to recognise your computer when a user of your computer returns to a website and most websites use cookies to improve user experience.

7.2. Our website uses cookies to store your information when you make an online booking request or use our online contact form.

7.3. By using our online booking and contact form services you are agreeing to the use of cookies. You will also be made aware of alternative means of contact and booking, which do not require use of cookies. This will not affect the service you receive.

7.4. If you do use these online services your details will be deleted from the website when these are no longer necessary to meet your request or perform the service you required.

## **8. Children and Young People**

8.1. Protecting the privacy of young people is very important to us. When we collect data about anyone, we will make the reasons for collecting the data clear and explain the use that is made of such data using age-appropriate language.

8.2. Where personal data is collected for those aged 13 or under, we will always seek parental/carer consent where consent is required.

## **9. Sharing your Information**

9.1. We will never sell or share your information for marketing purposes.

9.2. We may need to share your information with some of our partners or trusted service providers to enable us to provide the services you have requested. When this is necessary we have measures in place to ensure its security, for example, we draw up partner agreements and contracts for our service providers.

9.3. Some service providers may be based outside of the EEA, for example our website is hosted by Wordpress (registered in the USA). Whilst these providers are not subject to the same data protection laws, we are careful to ensure that our suppliers provide an adequate level of protection in accordance with UK data protection law.

9.4. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside the EEA.

## **10. How long we retain your data**

10.1. We will only keep your data for as long as we need to in order to operate the service which you have requested and for as long as required in accordance with legal requirements and tax and accounting rules. When your data is no longer needed, we will dispose of it in a secure manner.

10.2. Where your data is provided by consent for marketing and promotion of services, consent will be resought every 3 years and you will be asked if you wish to opt in. When consent is not renewed, this personal data will be securely destroyed.

## **11. Your rights**

11.1. You have the right to:

- Access - you have a right to ask for a copy of any information we hold about you (known as a subject access request).
- Rectification - You can change the information we hold about you. If you identify any inaccuracies please do let us know.
- Erasure - you can ask us to 'forget' you. This means we will stop processing your personal data and erase it from our system. If the information is not necessary for the purpose you provided it to us, and so long as it does not breach any legal obligations we have, we will do so.
- Restrict processing - This means that we will keep your information, but will only process it in certain circumstances.
- Data portability - you have the right to obtain and reuse a copy of the personal information we hold on you to use for your own purposes.
- Object - you have the right to object to the processing of your information if we have based the processing on a legitimate interest rule or are processing it for direct marketing.

- Automated decision making - we do not carry out any automated decision making or profiling activity.

## **12. Reporting a breach**

12.1. If we become aware that there has been a security breach, for example, the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of somebody's personal data, we will report this to the Information Commissioner's Office within 72 hours of becoming aware of the breach.

12.2. If the breach is likely to cause adverse effects to the individual whose data has been breached, we will also notify that individual as soon as possible.

## **13. Concerns or complaints**

13.1. If you have any concerns or complaints regarding our privacy statement or practices, please contact our Creative Director (see 2.3).

13.2. You have the right to lodge your concern with the Information Commissioner's Office. Visit <https://ico.org.uk/concerns/> for more information.

## **14. Reviewing this policy**

14.1. This policy will be reviewed regularly and we may make changes from time to time, so we ask that you check the policy for any updates. The date of the latest update will be clearly stated at the bottom of this policy.

This policy was last updated on the 21/05/2018