This is the privacy policy **of Upland Arts Development CIC.** We are a membership organisation constituted as a Community Interest Company Limited by Guarantee No. SC350101.

We understand that your personal information and privacy is important to you. This privacy policy outlines how we strive to ensure that the information you share with us is recorded accurately, retained securely and used only per your wishes. We protect your personal information and adhere to all current data protection act legislation with respect to protecting privacy. We do not give out, sell or trade our mailing list data with external organisations. We comply with the Data Protection Act 1998, the Privacy and Electronic Communications Regulations (PECR) and the new General Data Protection Regulations (GDPR) 2018.

### How we use your information

This privacy notice tells you what to expect when we collect personal information. It applies to information we collect about people

- who visit our websites and social media channels
- who email us
- who sign up for our e-newsletter
- who respond to a visitor survey
- who book tickets or make a purchase
- join as a member
- who become a friend or make a donation

Personal information we collect may include:

- your full name and title, date of birth
- postal address, postcode, email address and phone number
- images of you individually and/or within a group
- current art form interests

We will also collect and hold information about any contact you have with us as a ticket buyer, visitor, donor or supporter of Upland Arts Development CIC, and may include details of:

- ticket purchases and attendance
- membership and donor status
- retail purchases
- contact preferences
- details of correspondence sent to you, or received from you
- any other information provided by yourself at the request of Upland to process a transaction

When we ask you to provide your personal information we will let you know why we are asking, and how we will use your data, by directing you towards this notice.

In addition to the specifics outlined below of how we collect and use your personal information for your chosen service(s), we will use your personal information to:

- a) contact you if we need to obtain additional personal information or permissions from you
- b) check our records of your personal information are accurate and up to date
- c) check you are happy, satisfied and still wish to receive the service(s) you have chosen

We do not collect debit/credit card details, PayPal information or any other financial details used to purchase tickets or book onto a workshop. We do not rent or trade your personal information with other organisations and businesses. We may use selected third parties that we contract to be our 'processors', who must act only on our instructions and to achieve the purposes set out in this policy and who will not use your personal information for their own purpose. These include suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts, database providers, server hosts or cloud storage providers; Financial companies such as Paypal and GoCardless that collect or process donations on our behalf and social media platforms

This privacy notice does not apply to businesses or organisations.

Under the General Data Protection Regulation individuals have the right to make a request for information, rectification, erasure, restriction, transfer, and/or object to the processing of their data. If this concerns you, please see more information about your rights and how to use them below.

### PEOPLE WHO VISIT OUR WEBSITES

When someone visits our websites we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. 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. If we do want to collect personally identifiable information through our website, we will be up front about this and ask for your explicit consent. We will make it clear when we collect personal information and will explain what we intend to do with it.

Our website uses cookies to save browsing preferences and to optimise users' browsing experience.

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our websites. We use cookies to:

- recognise you whenever you visit this website (this speeds up your access to the site as you do not have to log on each time)
- carry out research and statistical analysis to help improve our content and to help us better understand our visitor and customer requirements and interests
- make your online experience more efficient and enjoyable

The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your computer or other electronic device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you—but only where you voluntarily provide it (e.g. by completing an online form) or where you purchase goods or services from us.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

# Third party links

You might find links to third parties (e.g. external creative organisations and suppliers) on our Website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them. In cases when we use external websites provided by other organisations such as Twitter, YouTube or Facebook, then we would ask you to consult their privacy policies.

# **PEOPLE WHO E-MAIL US**

We use a third party provider, Gmail, for our email services. Our provider uses a Secure Sockets Layer (SSL) to encrypt and protect email traffic. Messages are sent using SSL between Upland and Gmail. However, you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. If you wish to exercise any of your rights please write to us at <a href="mailto:hello@weareupland.com">hello@weareupland.com</a>

# PEOPLE WHO SUBSCRIBE TO OUR NEWSLETTER

# **E-Newsletter**

We issue a regular e-Newsletter containing news about us and opportunities, events, news, etc. we believe are of relevance to you.

If you consent to receive our e-Newsletter we will collect personal information from you and use it for the purpose of sending you our e-Newsletter only.

We use <u>Mailchimp</u>, a third-party processor, to deliver our e-Newsletter to you. We gather statistics around openings and clicks using industry standard technologies so we can monitor and improve our e-Newsletter, its content and delivery to you. You can read <u>Mailchimp's Privacy Policy</u>.

You can unsubscribe from our e-Newsletter at any time by clicking the unsubscribe link in the footer of any of our e-Newsletters or by emailing our Administrator info@weareupland.com

### **ONLINE SALES AND FRIENDS**

We use <u>WebCollect</u> to process online payments for our friends scheme and you can review their privacy policy here <u>https://webcollect.privacy-notice</u>

Bookings for event tickets are processed by **Eventbrite** which has its own **privacy policy**.

### **Online Feedback surveys**

We use **SurveyMonkey** to ask for feedback on our events. We use **SurveyMonkey** software to help us monitor and improve our events. The information collected may be used to report to our funders, which is anonymous. Individuals have the choice to take part in surveys and which questions to answer. You can view SurveyMonkey's privacy policy here.

### **ANONYMISED DATA SHARING**

We share anonymised data statistics with other organisations for purposes of reporting to funders (e.g. Creative Scotland, Dumfries & Galloway Council, Leader, the Holywood Trust and EventScotland), working in partnership with other organisations, and for our own evaluation reports. This data is used to analyse and report on our work.

#### **ACCESS TO YOUR PERSONAL INFORMATION**

You are entitled to contact Upland to request;

- A copy of your personal information
- Amendments to be made to your personal information
- For your personal information to be deleted for our systems

You can make the above request by emailing: <a href="hello@weareupland.com">hello@weareupland.com</a> or by writing to Upland Arts Development CIC, c/o Gracefield Arts Centre, 28 Edinburgh Rd, Dumfries DG1 1JQ

# Security

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site; any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We will process, disclose or share your personal data only if required to do so by law or in the good faith belief that such action is necessary to comply with legal requirements or legal process served on us or the Website.

Your personal information will be accessed and used only by Upland Arts Development CIC's Board Members, Advisers, staff and volunteers for the purpose(s) we agree with you and for the stated period. Unless we hear to the contrary, your personal information will be deleted at the end of this period.

Upland's Board Members, Advisers, staff and volunteers follow policies and procedures to ensure we protect the privacy, confidentiality, security and safety of your personal information when we collect and process it, to prevent its loss, misuse, unauthorised access, disclosure, alteration or destruction.

We are constantly trying to improve our website and services, so we may need to change this Privacy Policy from time to time. We will alert you to material changes by, for example, placing a notice on our website and/or by sending you an email when we are required to do so by applicable law. You are responsible for periodically reviewing this Privacy Policy.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data has been processed in a way that does not comply with <u>data protection</u>. You can do so by calling the ICO helpline on **0303 123 1113** or via their <u>website</u>.

This Privacy notice was last updated: 25th May 2018