

# Culture&

## Data Protection Policy

### Purpose

This Policy sets out how Culture& processes the personal data we collect from our partners, beneficiaries, our staff or any other third parties, via paper filling or our website. It outlines how Culture& will comply with the UK Data Protection Act 2018.

### Data Protection Principles

Culture& will ensure that all personal data are:

- used fairly, lawfully and transparently
- 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

### Why we collect data?

Culture& only collect and process personal data when it is necessary to carry out our business aims and deliver our charitable public benefit objectives. Here are the main ones:

- To recruit people
- To keep a record of our employees / members of staff
- To provide a service (events, training etc),
- To understand the needs of our beneficiaries and partners better,
- To inform you of events or updates you have asked for or contact you if we need to obtain or provide additional information.

We also collect information in order to better inform our Development team about prospective donors and to fulfil our fundraising goals as a charity. This is to ensure we are providing appropriate opportunities for people to support our work, should this form of engagement be of interest.

### What data do we collect?

Culture& collects the following data:

- Name,
- Contact email and number,
- Address, (membership only),
- CV and profile picture, (only when the activity requires),
- Website link, (only when the activity requires),
- Date of Birth, (only when the activity requires),
- Preferred Pronoun,
- Age group, (only when the activity requires),
- Access needs, (only when the activity requires)
- Current employment status, (only when the activity requires)
- Job title (only when the activity requires)

Culture& processes special category of personal data of beneficiaries, partners and third parties as it is necessary to pursue the organisation's mission and provide services for the organisation. We also process special category data of employees as it is necessary to comply with employment and social security law.

This includes the following personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural<sup>1</sup> person
- an individual's health
- a natural person's sex life or sexual orientation
- criminal convictions or offences

We may collect information about your computer, including your IP address, operating system and browser type, for system administration and to report aggregated information to our stakeholders.

### **How do we collect your data?**

You directly provide Culture& with most of the data we collect. We collect data and process data when you:

- Apply for a position at Culture&,
- Join as our network,
- Purchase tickets to our events, workshops etc.
- Sign up to our mailing list,
- Voluntary complete a customer survey or provide feedback on any of our message boards or via email,
- Use or view our website via your browser's cookies.

Culture& will ensure that when we process personal data, we have your consent and that you have been made aware that you have the right to withdraw your consent. Consent must be:

- Specific (not given in respect of multiple unrelated purposes)
- Informed (explained in plain and accessible language)
- Unambiguous and given by a clear affirmative action (meaning opt-in: silence, inactivity or pre-ticked boxes will not be sufficient)
- Freely given: Consent will not be valid if the data subject does not have a genuine and free choice or cannot refuse or withdraw consent without detriment.

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<sup>1</sup> In GDPR terms a natural person is a living, breathing, human being. This is to distinguish them from legal persons e.g. partnerships or corporations

We may also collect information from publicly available sources as part of our fundraising practice. This may include obtaining information from individuals working on our behalf such as development consultants.

### **How will we use your data?**

Culture& collects your data so that we can:

- Process your subscription to our newsletter
- Email you our newsletter and alert you to other services and events we think you might like.

### **Who do we share your information with?**

Culture& will never share, sell, rent or trade your personal information to any third parties for marketing purposes without your prior consent. We will ask for your consent to share personal information with partners. These requests will be specific to the individual organisation so that your consent decision is informed.

Some of our service providers may have access to your data in order to perform services on our behalf – payment processing is a good example of this. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

At a certain extent, we make sure anyone who provides a service for Culture& enters into an agreement with us and meets our standards for data security. They will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.

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

Culture& is committed to protecting the personal information you entrust to us. We will take appropriate technical and organisational measures to prevent the loss, modification or misappropriation of your data.

We will keep your information only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal obligations. We will not keep more information than we need. The retention period will vary according to the purpose, for example if purchasing a ticket only, we will typically keep your data for up to ten years from the date of your last transaction. For further information about how long we will keep your information, please contact [info@cultureand.org](mailto:info@cultureand.org).

### **What are your data protection rights?**

Culture& would like to make sure that you are fully aware of your data protection rights. Every user has the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased

- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [info@cultureand.org](mailto:info@cultureand.org).

## **Data Breach**

In the event of a cyber-attack resulting in the loss of Personal Identifiable Information Culture& will in the first instance notify the named Culture& Data Breach Manager. They will work with our IT services provider to notify anyone who might be impacted if they are considered to be at high risk of identity theft. The IT services provider will also advise on reporting the incident to the Information Commissioners Office (ICO) within the 72 hour window if deemed necessary.

## **Privacy policies of other websites**

Culture&'s website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## **GDPR**

Culture&'s website complies with GDPR rules. A link at the bottom of the home page outlines our privacy policy.

We operate a number of social media pages (including Facebook, Twitter and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

### **1. Queries and complaints**

If you have any questions about Culture&'s privacy policy, the data we hold on you, or you would like to exercise one of your data protections rights, please do not hesitate to contact us.

Email: [samuel.pontin@cultureand.org](mailto:samuel.pontin@cultureand.org).

### **2. Complaining to the Data Protection Regulator**

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details at: <https://ico.org.uk>

*September 2024*