**Privacy Policy**

**INTRODUCTION**

The Cromarty Arts Trust (CAT) needs to gather and use email addresses about individuals. This policy describes how this personal data is collected, handled and stored to meet the organisation’s data protection standards and to comply with the law.

**WHY THIS POLICY EXISTS**

This privacy policy ensures CAT:

• Complies with data protection law and follows good practice

• Protects the rights of customers, staff and partners

• Is transparent about how it stores and processes individuals’ data

• Protects itself from the risks of a data breach

**DATA PROTECTION LAW**

The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. It requires personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;

2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes;

3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of individuals;

6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

7. The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

**DATA PROTECTION OFFICER (DPO)**  
The person responsible for fulfilling the tasks of the DPO in respect of CAT is Gail Stuart-Martin, Administration Officer who may be contacted at Ardyne, Bank Street, Cromarty IV11 8YE, telephone number 01381 600354 or at [info@Cromartyartstrust.org.uk](mailto:info@Cromartyartstrust.org.uk).

**SCOPE OF PERSONAL INFORMATION & USEAGE**

Cromarty Arts Trust holds the names and emails of individuals who have chosen to be on our mailing list. Where individuals have booked onto our courses and events or hire accommodation or studio work spaces, we may also hold postal addresses and telephone numbers, and other information provided in order to enable us to provide our services to you, and this information is on predominantly paper documents, filed securely in our office system.

The key email address data is held in a MailChimp database and will be exported into cvs files if it needs to be migrated. The mailing list is reviewed annually to confirm it is correct and members can select to unsubscribe at any time.

The data is used to send emails to the public to inform them of our programme of events, courses, workshops, gigs, exhibitions, etc and any other relevant news or updates that we feel are of interest.

Individuals request to be added to our list, usually via a sign-up option on our website or by word-of-mouth, email request or by leaving their email address on a hand-written sheet at our events. This request forms the basis of their consent. Each of our communications has a note indicating how they can be removed from our list and this unsubscribe function is carried out automatically.

Other personal information held by the Trust consists of applications for employment, contracts of employment, PVC disclosure checks undertaken with consent, and relevant information provided by trustees, members of the Trust’s local management group and volunteers.

We will only hold information for as long as reasonable in accordance with our legitimate interests.

**DATA SHARING**

We do not pass on data to any organisations except as necessary for the administration of our activities. We employ the services of third parties to help us in certain areas, such as email services and payment processing and we may share information with one or more of these third parties for the purposes of managing our operations. These third parties may in some cases be based in countries outside the European Economic Area which have different data protection standards to those which apply in the European Economic Area, for the purposes set out in this Policy. In such cases we will rely on appropriate data protection safeguards, such as a relevant Privacy Shield (e.g., the EU-US Privacy Shield).

**SUBJECT ACCESS REQUESTS**

Any individual can contact the CAT through our website or social media accounts and request to see the information we hold on them and request that it be corrected in the case of inaccuracy or erased if there is no longer a justification for its retention. These requests will be responded to in confidence by a member of staff.

**COMPLAINTS**

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.