

Data Protection Policy

The Courthouse Arts Centre respects the privacy of its staff, patrons and supports and complies fully with the Data Protection Act 1988 (amended by the Data Protection Amendment Act 2003) and GDPR 2017. Any personal details collected through our web site and provided by you will be processed in accordance with the Act, and will only be used for the purpose we have your consent for.

General Data Protection Regulation (GDPR)

What is GDPR?

A new data protection EU law called the General Data Protection Regulation (GDPR) will come into force on 25th May 2018. This gives EU residents more control over their personal data. People can now request *how much* data an organisation holds on them, *ask to see* this data and ask for it *to be deleted*.

As an organisation that process's data we must be able to *demonstrate* compliance with GDPR.

What does GDPR mean for The Courthouse Arts Centre?

The legislation will introduce major changes in how organisations acquire and handle both ordinary personal data and sensitive personal data.

- Ordinary Personal data includes: a persons name, address, email, phone no, photos, bank details.
- Sensitive Data includes: racial/ethnic origin, political opinions, physical or mental health, religious/philosophical beliefs, trade union association, sexual orientation, sex life, criminal convictions, genetic data and biometric data.

The Courthouse Arts Centre **ONLY** collects ordinary Personal Data on our staff and audience members. Sensitive data may be returned to the artistic director/board under Garda vetting procedure, i.e a criminal conviction, as part of our Child Safeguarding Policy. All members of staff are Garda vetted. The

legal bases for this is 'Contractual Necessity' and employee's will be asked to *consent* to providing us with this data as part of their contract with the company prior to taking up their role.

What data we collect and Why?

- **Staff:** Name, address, email, telephone, PPS no, DOB, bank account details, Emergency contact details, doctor contact details.
Why? Employee records and Revenue records.
- **Audience:** Name, address, email, telephone, payment details (not stored on our systems).
Why ? Ticket sales
- **Audience:** Name, address, email, telephone, types of events attended and genre preference.
Why? Marketing and promotions.

When do we collect ordinary personal data?

- When a new employee is offered a position and signs a contract with us.
- When our audience sign up to our mailing list; both in hard copy and online through our website.
- When our audience become a Friend of the Courthouse through an annual subscription.
- When our audience book a ticket with us; in person, by phone or online.

The Data Journey & safeguarding of information:

How do we store our audience information?

In GDPR terminology the Courthouse is a *Data Controller* – it is *OUR* responsibility for storing and handling our staff and audience data safely both on computers and in hard copy files. Our Data Officer is the Artistic Director.

Our ticketing software company – Future Ticketing (FT) – is a *Data Processor*. They process personal data on our behalf but are not responsible for or control the data. The Courthouse ensures that FT complies with current GDPR guidelines and the Courthouse retains *FULL* control over the data stored on FT servers. This data is *never* sold or shared with third parties and exists on FT servers separate from their other client companies. This separation ensures that should a breach happen in one FT client company file all other client companies are protected within their own files. FT servers are stored in Dublin, Ireland and backed up in Frankfurt, Germany and therefore are governed by Irish and EU legislation. Below is a link to Future Ticketing's Privacy Policy.

<http://www.futureticketing.ie/privacy-policy/>

Our emailing software company – MailChimp - is a *Data Processor*. They process personal data on our behalf but are not responsible for or control the data. The Courthouse ensures that MailChimp complies with current GDPR guidelines and the Courthouse retains *FULL* control over the data stored on MailChimp servers. This data is *never* sold to third parties, however, Mailchimp may share data with companies that they work with for support or promotion purposes. Our data exists on MailChimp servers separate from their other client companies. This separation ensures that should a breach happen in one MailChimp client company file all other client companies are protected within their own files. MailChimp servers are stored in the USA but through their EU/Swiss privacy shield and GDPR regulation Mailchimp are governed by EU legislation. Below is a link to Mailchimp's Privacy Policy.

<https://mailchimp.com/legal/privacy/>

Protocol should a data breach occur

Following the discovery of a data breach involving personal data the Data Protection Commissioner and the data Subject will be informed 72 hours after the discovery. The nature of the breach, the action that has been taken, and the potential impact will be relayed to both.

Access to your Personal Data

If you would like to review the data we hold for you on our database please contact us and we'll arrange for this information to be disclosed. For security reason we will ask you to provide proof of identification. You also have the right to rectify or delete inaccuracies in your personal data, and to object to the processing of your personal data.

The Data Journey for employee's of The Courthouse Arts Centre

- Personal Data on employee's will be collected by senior staff/board members before employment commences. The *legal bases* for this is 'Contractual Necessity' and employee's will be asked to *consent* to providing us with this data as part of their contract with the company. This data must be kept for 7 years from the end date of the contract for audit purposes.
- All employee records will be safeguarded by : hard copies kept in a locked filing cabinet at The Courthouse Arts Centre, Main St, Tinahely Co Wicklow and online records kept on the artistic director's and administrators PC's will be password protected.
- Our accountant/auditor (Sean Brennan's, 1 St. Michael's Court, Gorey, Co Wexford) will have access to employee records for Revenue processing necessity. Records will be stored on password protected PC's.
- After 7 years personal data on employee's no longer with the company will be deleted, both online and in hard copy format from all of the above mentioned locations (digital and physically).

The Data Journey for artists paid/hired by The Courthouse Arts Centre

- Personal Data on artists paid or hire by the Courthouse Arts Centre will be collected by senior staff members at engagement of work. The *legal bases* for this is 'Contractual Necessity' and artists will be asked to *consent* to providing us with this data as part of their contract/invoicing with the company. This data will be kept for 7 years from the end date of the contract for audit purposes.

- All artists' records will be safeguarded by : hard copies kept in a locked filing cabinet at The Courthouse Arts Centre, Main St, Tinahely Co Wicklow and online records kept on the artistic director's and administrators PC's will be password protected.
- Our accountant/auditor (Sean Brennan's, 1 St. Michael's Court, Gorey, Co Wexford) will have access to artist's records for Revenue processing necessity. Records will be stored on password protected PC's.
- After 7 years personal data on artist's no longer with the company will be deleted, both online and in hard copy format from all of the above mentioned locations (digital and physically).

The Data Journey for audience's of The Courthouse Arts Centre

- Personal Data on audience members of the Courthouse Arts Centre will be collected by reception, PR and production staff members. The legal bases for this is 'legitimate interest' and audience will be asked to *consent* to providing us with this data as part of their ticketing processing and/or mailing list sign up requirement. This data will be kept electronically for 1 year at the end of which audience members will be asked if they wish to be kept on our lists or removed. Audience can request being removed from any of our databases at any time during the year.
- All audience records kept in hard copy will be stored in a locked filing cabinet at The Courthouse Arts Centre, Main St, Tinahely Co Wicklow. Online records will be kept on staff PC's and all are password protected.
- Our accountant/auditor (Sean Brennan's, 1 St. Michael's Court, Gorey, Co Wexford) will have access to audience records for audit processing necessity. Records will be stored on password protected PC's.
- After 12 months personal data on audience who do not respond to a re-consent email will be deleted online. Hard copy data will be deleted after 7 years. Requests to delete data will be completed within 30 days.
- At no time does the Courthouse store credit card details from customers, these details are entered at the time of booking into our secure online booking system managed by Future Ticketing and are not

stored. Future Ticketing uses a secure tokenised payments process to protect customers and the data controller.

The Data Journey for Young audience's of The Courthouse Arts Centre

- Personal Data on young audience members of the Courthouse Arts Centre will be collected by reception, PR and production staff members *from* parents/guardians. The legal bases for this is 'legitimate interest' and 'Emergency Contact' requirements and parents/guardians will be asked to *consent* to providing us with this data as part of their ticketing processing and/or mailing list sign up requirement. This data will be kept electronically and in hard copy for 1 year at the end of which audience members will be asked if they wish to be kept on our lists or removed. Hard copy files are kept in a locked press at reception for staff to efficiently access emergency contact information. Parents/guardians can request being removed from any of our databases at any time during the year.
- At no time will young audience member's data be shared over our social media platforms or any commercial internet services. Images of young audience will not used without consent given. Young audience will be informed in age appropriate language as to the type of data we hold on them.
- Our accountant/auditor (Sean Brennan's, 1 St. Michael's Court, Gorey, Co Wexford) will have access to audience records for audit processing necessity. Records will be stored on password protected PC's.
- After 12 months personal data on young audience who do not respond or whose parents/guardians do not respond to a re-consent email, their data will be deleted online and in hard copy. Requests to delete data will be completed within 30 days.