

**Privacy Policy**

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

We will keep this page updated to show you all the things we do with your personal data. This policy applies if you are a supporter, volunteer, participant, customer or employee of Equal Arts, or use any of our services, visit our website, email, call or write to us. In certain circumstances we may also provide an extra privacy notice, which will always refer to this page.

We will never sell your personal data and will only share it with organisations we work with when it is necessary. The privacy and security of your data is assured.

**Who we are**

In this policy, whenever you see the words ‘we’, ‘us’, ‘our’, ‘Equal Arts’ ‘Northern Shape trading as Equal Arts’, it refers to Equal Arts.

Equal Arts is the trading name of Northern Shape and is a registered charity in England and Wales (charity number 517352). We are also a company limited by guarantee (company number 1992359). This Privacy Policy applies to the above entity.

Equal Arts' registered address is Swinburne House, Swinburne Street, Gateshead, NE8 1AX.

This Privacy Policy relates to information which is obtained by Equal Arts and for which Equal Arts is the Data Controller.

Equal Arts is a leading creative ageing charity supporting older people and those living with dementia in the North East and across the UK. Our team works to improve the lives of older people through creativity and our projects provide a wide range of creative opportunities to improve people’s health and well-being. Project strands include HenPower, Creative Age and Creative Friends. Equal Arts also provides creative ageing support, training and advice to health professionals, care staff and Residents and Relatives groups in a range of different care settings (for example community hospitals, care homes and sheltered housing).

Equal Arts also carries out a range of activities to generate income to enable us to carry out our charitable aims. This includes sponsored events, fundraising campaigns and the sale of merchandise online.

If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to information@equalarts.org.uk or addressed to the Data Protection Officer, Equal Arts, Swinburne House, Swinburne Street, Gateshead, NE8 1AX.

**What personal data do we collect?**

Your personal data (any information which identifies you, or which can be identified as relating to you personally for example, name, address, phone number, email address) will be collected and used by us. We will only collect the personal data that we need.

We collect personal data in connection with specific engagement activities such as participation in projects, information requests or enquiries, placing an online order, donations, volunteering, conducting research and employment.

You can give us your personal data by completing forms on our website, by participating in discussion boards on social media functions, taking part in projects, campaigns or research, by joining as an employee, volunteer, supporter, participant or customer or by corresponding with us (by telephone, email or in writing).

The personal data you give us may include name, title, address, date of birth, age, gender, employment status, demographic information, email address, telephone numbers, personal description, attitudes, opinions. As an employee, supporter (donations) or customer, you may also provide bank details.

**Personal data provided by you**

Personal data includes information you give when interacting with us, for example when you become a supporter, volunteer, employee, participant, placing an order at our online shop or communicating with us. For example:

* Personal details (name, date of birth, email, address, post code, telephone number)
* Financial information (payment information such as bank account details, credit or debit card or direct debit details, and whether donations are gift-aided)
* Your opinions and attitudes about Equal Arts activities or projects through social media or for the purposes of evaluation, training and research.

Your activities and involvement with us will result in personal data being created. This could include details of how you’ve helped us by volunteering or being involved with our campaigns and activities. If you decide to donate to us, then we will keep records of when and how much you give.

**Special categories of personal data**

At times we may collect special categories of personal data for Equal Opportunities monitoring, as well as researching whether we deliver great experiences for everyone, but this is only ever analysed at an aggregate level.

**Volunteering or employment**

If you are a volunteer or employed by Equal Arts (e.g. artist in residence), then we may collect extra information about you (CV’s, references, DBS checks, details of emergency contacts, medical conditions). This information will be retained for legitimate reasons and for safeguarding purposes.

**How we use your personal data**

We will only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

Personal data provided to us will be used for the purpose or purposes outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data.

Your personal data may be collected and used to help us deliver our charitable activities, help us raise funds, to provide a service to you, or complete your order or request. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our services and activities.

**Marketing communications**

Your privacy is important to us, so we will always keep your details secure. We would like to use your details to keep in touch about things that may matter to you.

If you choose to hear from us we may send you information based on what is most relevant to you or things you’ve told us you like. We may also show you relevant content online. This might be about volunteering with us, joining in with projects, campaigns, sponsorship events or fundraising.

We will only send these to you if you agree to receive them and we will never share your information with third parties. If you agree to receive marketing information from us, you can change your mind at any time to opt out.

However, if you tell us that you don’t want to receive marketing communications, then you may not hear about events or other work we do that may be of interest to you.

We will always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a supporter, volunteer, donor or buyer of goods or services. Examples include transaction messaging, such as Direct Debit schedules or shop purchase confirmations.

**Fundraising, donations and legacy pledges**

Where we have your permission, we may invite you to support our work by making a donation, volunteering, getting involved in fundraising activities or leaving a gift in your will.

Occasionally, we may invite some supporters to attend special events to find out more about the ways in which donations and gifts in wills can make a difference to specific projects and to our cause. We will also send you updates on the impact that you make by supporting us in this way, unless you tell us not to.

If you make a donation, we will use any personal information you give us to record the nature and amount of your gift, claim gift aid where you’ve told us you’re eligible and thank you for your gift. If you interact or have a conversation with us, we will note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause, we will use the personal information you give us to record your plans and contact you to support your fundraising efforts.

If you’ve told us that you’re planning to, or thinking about, leaving us a gift in your will, we will use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this.

If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we will note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you wanted.

Charity Commission rules require us to be assured of the provenance of funds and any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors who have made, or are likely to make, a significant donation to Equal Arts.

As part of this process we will carry out research using publicly available information and professional resources. If this applies to you, we will remind you about the process when you make your donation.

**Major donors**

If you are a current or prospective major donor, we will give you a bespoke privacy notice with further details of how we look after your data.

**Management of volunteers**

We need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include: contacting you about a role you might be interested in, expense claims you’ve made, and to recognise your contribution. It could also include information about things happening where you volunteer and about your volunteering, including asking for your opinions on your volunteering experience for evaluation or training purposes.

We may also share this with funders to help them monitor how their funding is making a difference.

**Retail sales from our online shop**

We process customer data to fulfil an order from our online shop. Your data will be used to communicate with you throughout the process, including to confirm we’ve received your order and payment, to confirm dispatch, to clarify where we might need more detail to fulfil an order, or to resolve issues that might arise with your order.

**Research and evaluation**

We carry out research with our supporters, participants, employees and volunteers to get feedback on their experience with us. We use this feedback for evaluation and training purposes and to improve the services that we offer.

If you choose to take part in research, we will tell you what data we will collect, why and how we will use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide special categories of personal data (e.g. ethnicity). You don’t have to provide this data and we also provide a ‘prefer not to say’ option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring).

With your consent, we may give some of your data to a research agency who carry out research and evaluation on our behalf (e.g. Northumbria University) and only where you have volunteered such data. Data may consist of age, post code, number of sessions attended to provide quantitative analysis and feedback or comments to provide qualitative analysis. The data will be anonymised.

**Recruitment and employment**

In order to comply with our contractual, statutory and management obligations and responsibilities, we process personal data, including special categories of personal data, from job applicants and employees.

Such data can include, but isn’t limited to, information relating to health, racial or ethnic origin and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it is processed is given below.

**Contractual responsibilities:** Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay; leave, maternity pay, pension and emergency contacts.

**Statutory responsibilities:** Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

**Management responsibilities:** Our management responsibilities are those necessary for the organisational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, absence, disciplinary matters, e-mail address and telephone number.

**Special categories of personal data**

Special categories of personal data is defined as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions.

In certain limited circumstances, we may legally collect and process special categories of personal data without requiring the explicit consent of an employee.

(a) We will process data about an employee’s health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee’s knowledge and, where necessary, consent.

(b) We will process data about, but not limited to, an employee’s racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

(c) Data about an employee’s criminal convictions will be held as necessary.

**Disclosure of personal data to other bodies**

In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee’s personal data with one or more third party supplier.

To meet the employment contract, we are required to transfer an employee’s personal data to third parties, for example, to pension providers and HM Revenue & Customs.

In order to fulfil our statutory responsibilities, we’re required to give some of an employee’s personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

**Updating your data and marketing preferences**

We want you to remain in control of your personal data. If, at any time, you want to update or amend your personal data or marketing preferences please contact us in one of the following ways:

### ****Call us:****

### 0191 477 5775, 9.00am - 5.30pm weekdays

### ****Write to:****Equal ArtsSwinburne House,Swinburne Street,Gateshead,NE8 1AX

Verification, updating or amendment of personal data will take place within 30 days of receipt of your request.

## Your data protection rights

Where Equal Arts is using your personal data on the basis of consent, you have the right to withdraw that consent at any time. You also have the right to ask Equal Arts to stop using your personal data for direct marketing purposes. Please contact us using the details above.

## Subject access rights

If you would like further information on your rights or wish to exercise them, please write to us at Data Protection Officer, Equal Arts, Swinburne House, Swinburne Street, Gateshead, NE8 1AX or email information@equalarts.org.uk. You will be asked to provide the following details:

* The personal information you want to access;
* Where it is likely to be held;
* The date range of the information you wish to access.

We will also need you to provide information that will help us confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

Once we have all the information necessary to respond to your request we will provide your information to you within one month. This timeframe may be extended by up to two months if your request is particularly complex.

## What to do if you’re not happy

In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO) if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at [www.ico.org.uk](http://www.ico.org.uk/).

### Keeping your information

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

### How we secure your data

Information system and data security is imperative to us to ensure that we are keeping our supporters, participants, customers, volunteers and employees safe.

We operate a robust and thorough process for assessing, managing and protecting data and ensure that systems are up to date and secure against the ever-changing threat landscape.

Our staff complete mandatory information security and data protection training on employment and annually thereafter to reinforce responsibilities and requirements set out in our information security policies.

## Disclosing and sharing information

When we allow third parties acting on behalf of Equal Arts access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal data for other organisations to use.

Personal data collected and processed by us may be shared with the following groups where necessary:

* Equal Arts employees
* Third party service providers

**Third party service providers**

We may need to share your information with service providers who help us to deliver our projects, fundraising activities or process payments for our online shop. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

The service providers are:

MC Ware IT Solutions - provides support with cloud hosting, database design, website design and IT support.

Stripe Billing – provides the technical, fraud prevention and banking infrastructure required to operate online payment systems for the sale of Equal Arts merchandise from our online shop.

Mail Chimp – a marketing automation platform and an email marketing service. Equal Arts use Mail Chimp to design and distribute e-communications.

### Storage of information

Equal Arts operations are based in the UK and we store our data within the European Union (EU).

### Payment card security

Equal Arts uses third party service providers to ensure payment card security. Stripe Billing has an active PCI-DSS compliance programme in place. This is the international standard for safe card payment processes. As part of our compliance to this very stringent standard, we ensure that our IT systems do not directly collect or store payment card information; for example, the full 16-digit number on the front of the card or the security code on the back.

### Changes to this privacy policy

We will amend this privacy policy from time to time to ensure it remains up to date and reflects how and why we use your personal data and new legal requirements. Please visit our website to keep up to date with any changes. The current version of our privacy policy will always be posted on our website.

This privacy policy was last updated on 14 May 2018.