3.5. PRIVACY POLICY

This Policy is issued by Eyes Open CIC hereafter referred to as 'the Organisation'.

I. Introduction

- 1.1. Eyes Open are a Community Interest Company (CIC) registered **08330737**. We are managed by volunteer Directors who have no financial incentives and don't and will not use data for personal gain. The CIC is managed on behalf of the Community for social benefit included; learning, employment,
- 1.2. The Data Controller in this policy is The Bank Arts Centre (managed by Eyes Open CIC)
- 1.3. Address of Data Controller: 2 Castle Street, Eye, Suffolk, IP23 7AN
- 1.4. Our website address is: <u>http://www.thebankeye.org/</u>
- 1.5. The Chair of Directors is responsible for handling and Privacy and Data Protection issues.

2. Principles

- 2.1. The General Data Protection Regulation (GDPR) came in to force on 25th May 2018 across the EU. It makes important changes to Data Protection laws. The Regulation sets out 8 Data Protection principles. These require that personal information must:-
 - Be fairly and lawfully processed
 - Be processed for limited purposed
 - Be adequate, relevant and not excessive
 - Be accurate and up to date
 - Not be kept for longer than is necessary
 - Be processed in line with the data subjects rights
 - Be secure
 - Not be transferred to other countries unless they have similar adequate protection
 - 2.2. The Bank Arts Centre complies with these principles because it takes privacy seriously. It keeps your information for a number of purposes all of which are lawful in themselves or necessary to comply with other regulatory requirements e.g. Inland Revenue or DBS checks.
 - 2.3. It keeps the information up to date and securely, for the shortest possible time subject to legal constraints and respects your rights.
 - 2.4. For Volunteers personal information is taken from the application form, it is used to administer volunteering arrangements.

- 2.5. An annual process of confirming an" OPT In" is carried out and the information is held securely on a password protected server or if in hard copy, locked in a cabinet.
- 2.6. For employees personal information is held for the management of the JPC, payment of salaries and pension and expenses. Some of these details may be passed to external providers to arrange payment.
- 2.7. For Subscribers to newsletters and mail shots personal information is kept in order to communicate with them or in response to a contractual obligation. The information is kept securely.
- 2.8. Customers, Hirers' and Client contact details are kept for the purposes of selling tickets to events at The Bank Arts Centre and arranging bookings and receiving payment for these services.
- 2.9. The period of time the data is kept for depends on whether there is a statutory requirement e.g. 6 years in the case of the Inland Revenue or 5 years in the case of a Hirer.
- 2.10. The rights of the data subject are respected. If at any point you believe that the information we process on you is incorrect you can ask to see this information and even have it corrected or deleted. If you wish to raise a complaint on how the JPC has handled your personal data you can contact our Director who will investigate. If you are not satisfied with our response or think that we are acting unlawfully you can complain to the Information Commissioner's Office (ICO).
- 2.11. Our website may include links to external websites or use embedded content (such as videos, images, articles, etc.). These websites and content may collect data about you, use cookies, have embedded third-party tracking, and monitor your interaction with that embedded content. We ensure all information provided on the website is from trusted providers, and information share soley with us is never passed onto any partners or external Organisations. However, users of our website must be aware of the risk that issues with third-party sites is not within our Organisation's control.

Approved by Board of Directors.

Reviewed date: 4 January 2024 <u>Approved by:</u> AS

<u>Next review:</u> January 2025