

3.5. PRIVACY POLICY

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

1. 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: <http://www.thebankeye.org/>
- 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 Organisation complies with these principles because it takes privacy seriously. It keeps staff, customer and client 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 solely 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.

3. The type of personal information we collect

- 3.1. We currently collect and process the following information:
 - a) Personal identifiers, contacts, and characteristics (for example, name and contact details)

Approved by Board of Directors.

Reviewed date:
4 January 2025

Approved by:
AS

Next review:
January 2026

4. How we get the personal information and why we have it

- 4.1. Most of the personal information we process is provided to us directly by you for one of the following reasons:
 - a) Purchase of Ticket Sales / attendees to an event
 - b) Purchase / Collection or Artwork
 - c) For making a room hire/private booking
 - d) For communication – via mailing list (mailchimp)
 - e) Direct or ongoing correspondence (initiated by enquiry from the individual)
 - f) Completing surveys or volunteering feedback

- 4.2. We collect this information for the following reasons:
 - a) To enable us to send invoices for services
 - b) To keep records for book-keeping purposes
 - c) To communicate with our users – announce upcoming events which may be of interest, promote ticket sales and projects.
 - d) Deal with ongoing enquiries, feedback, comments and complaints.
 - e) Archive of feedback and complaints (in keeping with company policy)

- 4.3. We do not receive or collect personal information indirectly.

- 4.4. We may share this information internally within our Organisation – sharing collection with a Team member is only for the purpose intended. This may include but is not limited to – processing a complaint, passing general enquiries to the appropriate member of staff.

- 4.5. No information is shared with Third Parties unless otherwise specified or agreed.

- 4.6. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:
 - a) Your consent. You are able to remove your consent at any time. You can do this by contacting [Jon Betts, General Manager at info@thebankeye.org]
 - b) We have a contractual obligation.
 - c) We have a legal obligation.
 - d) We have a vital interest.
 - e) We need it to perform a public task.
 - f) We have a legitimate interest.

5. Your data protection rights

- 5.1. Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

6.2. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

7. How to complain

7.1. If you have any concerns about our use of your personal information, you can make a complaint to us at:

info@thebankeye.org
01379 873495
2 Castle Street, Eye, Suffolk, IP23 7AN

7.2. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>