

Creative Strathaven is committed to ensuring that your privacy is protected.

Should we ask you to provide personal and/or sensitive personal information when using our website or communicating orally or in writing with our personnel, including volunteers, then you can be assured that it will be used only in accordance with this privacy policy and in line with the principles of the Data Protection legislation.

This privacy policy explains what to expect when the collects and processes personal information about you.

Who do we collect information about?

Why do we collect information about you?

What information do we collect about you?

Marketing and sharing

Transfer of data overseas

Retention

Security of your information

Contact database

Website and Cookies

Other websites

Notice of breach of security

Changes to our privacy policy

Your rights

Complaints

How to contact us

Who do we collect information about?

Creative Strathaven collects information about our:

- Newsletter/Bulletin sign ups
- People who attend our events
- Participants in focus groups/research/campaigns
- Other contacts eg. Workshop tutors
- Photographs
- Volunteers
- Board of Trustees
- Supplier including consultants and contractors
- Financial information including expenses

Why do we collect information about you?

Creative Strathaven will collect personal and sensitive information about you for the following purposes:

- To support and coordinate our events such as workshops and makers markets
- To keep you informed (where you have signed up to our mailing list) about the work of Creative Strathaven including events and training courses
- To give you the opportunity to be involved in our events.
- To send you information about third parties which we think you may find interesting
- To improve the services we provide to you
- To publicise the work of Creative Strathaven
- To manage our volunteers
- To recruit
- To administer and maintain our accounts
- To maintain our records

What information do we collect about you?

Personal information collected may include your name, address, telephone number, e-mail address. We may also require sensitive personal information regarding any accessibility or dietary requirements you have.

If you are involved in focus groups, consultations, blogs, awareness raising, personal stories/case studies, events etc, your opinion, feedback, comments, and photographs may be collected by Creative Strathaven. We may also capture your views on video or audio, depending on the activity. If we are filming or photographing an event, this will be made clear to all attendees in advance.

If we are required to refund you for any reason we may need your bank details .

Marketing and sharing

Creative Strathaven sometimes needs to share the personal information we process with the individuals themselves and with other organisations. Where this is necessary we comply with all aspects of the data protection legislation.

Creative Strathaven and its sub-contractors will not sell, distribute, lease or otherwise disclose your personal information to third parties unless we have your written permission, or are required by law to do so.

Creative Strathaven's sub-contractors may have access to personal data while operating our IT systems (including website), conducting our business or providing you with a service. However, in doing so, they will be bound by data protection legislation and Creative Strathaven's privacy policy.

Users of our website are notified when their information is being collected by any outside parties. We do this so our users can make an informed choice as to whether or not they should proceed with services that require an outside party.

Any personal data collected through Creative Strathaven's website will be treated as confidential and in line with the data protection legislation e.g. signing up to newsletters.

Transfer of data overseas

We may use third party sites such as SurveyMonkey and Eventbrite to collect data. These sites are based in the USA, outside of the EEA, and are signed up to the EU-US Privacy Shield.

With your consent, Creative Strathaven may publish your case studies, work etc. on our website and via social media. In doing so, this information will be transferred overseas and accessible worldwide.

We use a third party provider via Wix.com to deliver our newsletters. Wix.com is also bound by Data Protection law. We record the addresses of undeliverable emails and those who have unsubscribed and do so in order that we maintain accurate and up to date records.

Retention

We retain your personal information only for as long as necessary to provide you with my services and as described in my Privacy Policy. However, we may also be required to retain this information to comply with our legal and regulatory obligations, to resolve disputes, and to enforce agreements. We generally keep your data for the following time period: 4 years.

Security of your Information

We are committed to ensuring that your information is secure.

To prevent unauthorised access or disclosure we have put into place physical and electronic procedures to safeguard and secure information we collect from you.

Physical Controls

All confidential hard copy filing is kept in a secure, locked file.

Electronic Controls

All accounts are password protected accounts.

No information containing personally identifiable information is saved to the hard drives of desktop PCs.

Creative Strathaven website and contact database are hosted via the internet and accounts are password protected.

Managerial Controls

Creative Strathaven Trustees and volunteers are made aware of the data protection legislation and policies and procedures of Creative Strathaven.

Contact Data Base

Creative Strathaven contact database contains identifiable information of our contacts.

The contact database is hosted on Wix.com. The database is accessed only by Creative Strathaven Trustees; all of whom are bound by the data protection legislation and Creative Strathaven's privacy policy.

Website

Creative Strathaven hosts a website: <https://www.creativestrathaven.co.uk>

Connections starting https are encrypted, those starting http are not.

Creative Strathaven uses third-party services to maintain, host and secure the performance of our websites. To deliver this service they process the IP addresses of visitors to the website.

Cookies

When users enter the Creative Strathaven website their computers will automatically be issued with 'cookies'. Cookies are text files which identify users' computers to the Wix server. The website then creates "session" cookies to store some of the preferences of users moving around the website, e.g. retaining a text-only preference. Cookies in themselves do not identify individual users but identify only the computer used and they are deleted on departure from the website.

Many websites do this to track traffic flows, whenever users visit those websites.

The Creative Strathaven website uses third-party cookies to measure use of the website including number of visitors, how frequently pages are viewed, and the city and country of origin of users. This helps to determine what is popular and can influence future content and development. For this purpose, Creative Strathaven uses Google Analytics to measure and analyse usage of the website. The information collected by Creative Strathaven will include IP address, pages visited, browser type and operating system.

Users can set their web browsers to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to that user.

Other Websites

The Creative Strathaven website contains links to other sites. Please be aware that Creative Strathaven is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of every website that collects personally identifiable information. This privacy statement applies solely to information collected by Creative Strathaven.

Notice of Breach of Security

If a security breach causes an unauthorised intrusion to our system that materially affects the information we hold about you, we will notify you as soon as possible and later report what action we took in response.

Changes to our Privacy Policy

If we decide to change our privacy policy, we will post the updated privacy statement to the website and any other places we deem appropriate, e.g. the Creative Strathaven newsletter, so our users are always aware of what information we collect, how we use it, and under what circumstances, if any we disclose it.

Your Rights

You have the right to:

- access your information
- withdraw consent to use of your information
- have inaccurate personal data corrected
- be forgotten
- request the restriction of processing
- data portability
- not be subjected to automated decisions and profiling
- lodge a complaint with the Information Commissioner's Office (ICO)

Access to your information (Subject Access Request)

Upon written request to Creative Strathaven, individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection legislation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to;
- for how long it will be retained and
- let you have a copy of the information in an intelligible form and portable form
- tell you if it has been transferred overseas and what safeguards were put in place
- tell you the source of the information if it did not come directly from you
- notify you of your right to have the information corrected, made complete or erased
- advise you of your right to complain to the Information Commissioner's Office

Creative Strathaven will provide you with this information within one month. Creative Strathaven can refuse to provide you with this information if we cannot do so without disclosing personal information about another person or if your request is excessive.

To make a subject access request you should contact creativestrathaven@gmail.com

Withdraw consent

You should be aware that you can withdraw your consent at any time. Should you choose to withdraw consent Creative Strathaven will delete your personal information.

If you have consented to your personal information being made public in blogs, on social media or via any other channel, you must note that Creative Strathaven can only

delete its future use of your information, unless it has another legal basis to justify holding on to your personal information.

Correction of inaccurate personal data

You have the right to have any inaccurate personal information held by Creative Strathaven to be corrected and you have the right for incomplete personal data to be made complete. Creative Strathaven encourages individuals to provide us with updates to their personal information in accordance with the purpose for processing. Creative Strathaven will notify any third parties to whom it disclosed the information of the updates.

Right to be forgotten/data erasure

The right to be forgotten entitles you to have your personal data erased, further dissemination of the data stopped and, potentially, have third parties halt processing of the data. The conditions for erasure include the data no longer being relevant to the original purposes for processing, or when the data subjects withdraw consent. These rights exist if there are no overriding legitimate grounds for processing e.g. the performance of a contract.

Creative Strathaven will notify any third parties to whom it disclosed the information of the changes to processing.

Restriction of processing

You have the right to request the restriction of the processing of your information if you contest the accuracy or lawfulness of the personal data. Restriction means that the information can only be processed with your consent or in defence of a legal claim.

It also applies where you object to the processing and Creative Strathaven is considering whether its legitimate grounds override your individual rights or when processing is unlawful but you oppose erasure and request restriction instead.

If you no longer need the personal data but the individual requires the data to be retained to allow them to establish, exercise or defend a legal claim

Right to Portability

The right to data portability allows individuals to obtain and re-use their personal data for their own purposes across different services.

The right to data portability only applies:

- to personal data an individual has provided to a controller;

- where the processing is based on the individual's consent or for the performance of a contract; and
- where the processing is carried out by automated means.

The personal data will be provided in a structured, commonly used and machine readable format. Examples of appropriate formats include CSV and XML files.

Complaints

Should you wish to complain about how Creative Strathaven have handled any aspect of your personal data, you can contact us using the details below and/or by contacting the Information Commissioner's Officer (ICO) <https://ico.org.uk/concerns/> (this link will take you away from our website) or write to them at:

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

Tel: 0303 123 1113

How to contact us

If you have any questions or suggestions regarding our privacy policy, please contact us at creativestrathaven@gmail.com

Website URL: <https://www.creativestrathaven.co.uk>

It should be noted that Creative Strathaven's e-mail system is not encrypted and anyone sending personally identifiable information via e-mail should be aware of this.

Newsletter/bulletin sign ups

If you consent to receiving our newsletter (mailing list) we will add your details to the appropriate mailing list(s). Our newsletters have an unsubscribe function at the foot of each page that allows individuals to change their minds and unsubscribe, at any time, from receiving the newsletter. Alternatively, you can email Creative Strathaven at creativestrathaven@gmail.com to withdraw your consent.

People who attend our events

If you consent to attending one of our events, Creative Strathaven will collect your name, contact details, dietary and accessibility requirements.

We will use this information to prepare a delegate list, to inform the venue of any accessibility and dietary requirements you may have, to invoice you for your fee (if applicable), to sign you up to workshops (if applicable) and to keep you informed about the event. Photographs may be taken at the event and used for publicising the event

and the wider Creative Strathaven portfolio. People attending the event are notified that photographs will be taken and can choose not to participate.

We may contact you after the event for feedback and to enquire whether you would like to receive any further information about or become more involved with Creative Strathaven.

Once the event has been held, we will retain your data for one year. This is to allow us to follow with regards feedback and enquire whether you would like to receive our newsletter. If you are already an existing contact your information will be retained in accordance with your existing relationship.

Participants in blogs/focus groups/research

If you are participating in any other Creative Strathaven activity such as focus groups, blogs, competitions, surveys, campaigns etc. Creative Strathaven will obtain your consent before processing your information.

How your information is handled will depend on each activity and will be in accordance with the consent provided by you.

If we are working with another organisation and need to provide your information to them, you will be notified of this prior to your giving consent.

You should ensure that you understand prior to giving your consent how your information will be used and with whom it will be shared.

The information may be used in newsletters, campaign materials, published on social media and our website etc.

Whether you will be identifiable from the information will depend on the consent that you provided e.g. if you appeared in a video you will be identifiable from your appearance. If you provided a blog for example, you may be identifiable from the content, or from your name if you consented to this, and if you completed an online survey your IP address will have been collected by the third party survey site. Other information may not explicitly be identifiable, however, Creative Strathaven cannot guarantee this.

Your personal information will be retained in accordance with the consent you provided. Information that you have consented to being made public will be retained permanently.

Photographs

Creative Strathaven may take photographs at events and workshops or for case studies, publications, website, social media, promotion or marketing purposes both printed and online.

If we are taking your photograph as part of a case study or blog then we will require to have your consent prior to taking the shots.

If we are taking photos for a legitimate business reason e.g. as part of a large event, such as our Christmas Makers Market, and you do not wish to be photographed you will be advised in advance to notify Creative Strathaven that you do not want to be photographed. You may also notify Creative Strathaven and photographer on the day of the activity, if you do not want to be photographed. Creative Strathaven will ensure notification is openly displayed at any such event.

You may notify us at any point if you wish us to stop using your image, in which case it will not be used in any future publications but will continue to appear in publications and social media channels already in circulation.

Creative Strathaven will retain photographs for a maximum of 1 year unless they are published and then these will be kept permanently.

Other Contacts

If we are holding your personal information for legitimate business reasons e.g. if you are a media contact and we may wish to contact you to highlight Creative Strathaven business, we will hold your information indefinitely and will check it annually for accuracy.

Volunteers (except Board members)

When individuals consent to volunteer at Creative Strathaven we will use the information provided by you to process your application. The information we collect is your name and contact details and for what type of role you are interested in volunteering.

If you are unsuccessful in finding a suitable volunteer role with Creative Strathaven, we will hold your personal information for 6 months from the date you applied and then it will be destroyed or deleted.

If you are successful, we will compile a file relating to your volunteering. The information contained in this file will be kept secure and will only be used for purposes relevant to your volunteering.

Once you have ceased to volunteer with Creative Strathaven, we will retain the file for one year following the tax year you ceased to volunteer.

Board Members

When you volunteer to join Creative Strathaven board we will require some basic information from you including your name, correspondence address and a short biography.

If you are successful we will require to know your title, forename(s), surname, former name(s), country of residence, nationality, date of birth, business occupation, residential address.

Creative Strathaven will post your name on our website together with whether you are an office bearer.

We are required to keep a register of trustees which your details will remain on for the duration of your tenure and then for 10 further tax years following your resignation date.

Suppliers including consultants and contractors

For the performance of our contract with you, we will request details of suppliers' names, addresses, mobile phone numbers and bank details. While most of this information will relate to an organisation, there will be occasions where it is also the individuals' home address and personal mobile number.

This information will be kept for 6 years following the tax year in which it was collected.

Finance including expenses

If you have chosen to attend a "charged for" activity and you have elected to be invoiced for the payment, we will require your postal address to issue the invoice.

If we have agreed to reimburse you and you have chosen to be paid electronically, we will require your bank account name, sort code and account number. If you have chosen to be paid by cheque, we will require your postal address. This information will be kept for 6 years following the tax year in which it was collected.