

## SEALL Data Protection Policy

SEALL, Sleat, Isle of Skye IV44 8RQ registered as a Charity, registration number: SC024859

### Introduction

SEALL is a cultural promoting organisation. This privacy policy sets out how SEALL uses and protects any information that you give to SEALL, to meet the SEALL's data protection standards and to comply with the law, particularly the General Data Protection Regulations that came into force on 25 May 2018.

### SEALL's Data Promise

"We won't ever pass on your details. It would be invasive for you, shows a lack of respect from us and is quite simply something that we'll never do. When you choose to sign up to receive any of our emails, book tickets or make enquiries, your personal information will be seen by us alone and used solely to tell you about SEALL. That's a promise."

### Basis of our Policy

- We collect minimal data, usually mostly names and emails and sometimes postcodes. If other projects require us to ask for more data, we ensure that this is kept to a minimum.
- We use this to provide you with up-to-date information about our events, and any changes or cancellations.
- We store this securely.
- We do not give out this information to any third party.
- We only use this data to tell you about SEALL.

### The Aim of the Policy is to ensure that SEALL:

- Complies with data protection law and follows good practice.
- Protects the rights of customers, staff and partners.
- Is transparent about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

### General Public Data before 25 May 2018

SEALL has collected data from those who have booked tickets with us – name, email and postcode. Sometimes a telephone number was also offered voluntarily. Using this data, SEALL has been sending responses to bookings, and providing updates and event news using Mailchimp. We contacted new ticket bookers explaining this and stating that unsubscribing is an easy option (which was frequently used). Most of the database, however, remained steady and in use by customers. Analytics show that this is a major part of SEALL's ticket booking business. On this basis we consider that SEALL has a 'legitimate interest' in the ongoing use of this data and have not therefore asked our current mailing list names to 'resubscribe'.

### Data Protection Officer

The SEALL person responsible for the correct collation, storage and use of data is Duncan MacInnes, Creative Director [info@seall.co.uk](mailto:info@seall.co.uk). The DPO will be responsible for the maintenance of SEALL's Record of Processing Activities

### Why we collect data

We need to initially store booking data for the efficient management of the event. This can subsequently be used to inform the ticket booker of changes to the event, up-coming events, programme changes and drawing attention to similar events to that previously booked. We will also use this to inform subscribers of general news relating to SEALL, fund-raising projects, job and volunteers opportunities

### How and what we collect

#### 1. Ticket bookers and proactive subscribers

Though our ticket booking system on [www.seall.co.uk](http://www.seall.co.uk) we ask for a name, email address and a postcode or country. The latter is to help us understand where our audiences are coming from. Ticket buyers can voluntarily add in a telephone number – useful for visitors who are not in internet contact.

There is a 'subscribe' button for those who wish to then start receiving e-newsletters via Mailchimp.

In addition we receive 'subscribe' requests by word-of-mouth, email, through event feed-back forms, or on forms inviting subscribers to our newsletter. All these form the basis of consent. After 25 May 2018 only new contacts who ask to 'subscribe' will be added to any newsletter lists. We will not add names without have some form of consent.

## **2. SEALL Members**

We ask those wishing to become a Member of SEALL or a Season ticket holder to supply Name, Address, Telephone and Email. Membership is also Company Membership SEALL Company Limited, and this data is a legal requirement. The Membership form asks for agreement to become a Company Member.

## **3. Volunteers**

Volunteers are usually drawn from our Members. We ask each to complete a short form with contact details, and any additional information relevant to their volunteering. This is kept as a hard copy form filed in the SEALL office.

## **3. Contracted employment and Company Directors**

There is a separate Privacy Policy

### **Where we store it**

Ticket booking information is stored securely through SEALL's website host, accessed only by SEALL staff Members.

Data for those on, or wishing to be on, the e-mailing list are managed on our Mailchimp site, again accessed only by SEALL staff Members.

Membership data and other non-digital data are securely stored in the SEALL office.

### **Sharing**

Quite simply we do not share any data. We do not pass on anything even to other cultural organisations. We use that data only to information people of events and news accessible on our website.

### **Other websites**

There are links from seall.co.uk to other websites. We have no control over their privacy policies or any information you may care to leave with them.

### **Access Requests**

At any time anyone receiving the newsletter can 'unsubscribe'. It is them impossible for SEALL to resubscribe that information.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. SEALL will consider each request in accordance with the General Data Protection Regulations. We will not charge a fee and aim to respond within 30 days. Contact SEALL on [info@seall.co.uk](mailto:info@seall.co.uk) or write to the DPO, SEALL, An Seòmar Uaine, Sabhal Mòr Ostaig, Sleat, Isle of Skye IV44 8RQ.

### **Third party sites**

SEALL uses Google Analytics to collect statistical information about which pages have been accessed. None of that information is linked to any personal data and no individuals are identified.

SEALL uses Mailchimp to deliver the newsletter. Mailchimp provides statistics on opening rates and clicks on links which help us monitor and improve our communications.

### **Online booking**

Our events are occasionally linked to third party online booking systems. The information you provide when booking tickets online is used primarily to protect your purchases and attendance at events and keep you informed about future activities.

We occasionally use SurveyMonkey to ask for feedback on our events. The information is anonymous but will be used to report to our funders. Individuals have the choice to take part in surveys and which questions to answer.

This Policy supercedes SEALL Private Policy of 1 October 2013.

This Policy was created in Draft Form on 23 May 2018. This will be ratified by the SEALL Board and will be reviewed on an annual basis.