

## PRIVACY POLICY

The Stithians Centre (TSC) takes your privacy very seriously. This privacy policy sets out what information we collect about you, for what purpose, how we use it, and also how you can talk to us about it.

### About us

The Stithians Centre is a registered charity No 1010543. Our address is The Stithians Centre, Church Road, Stithians, Cornwall TR3 7DH.

### What Information do we collect and for what purpose?

We collect your personal information when:

- you make direct enquiries with us
- you complete our Booking Form for hire
- you book or attend an event at TSC
- you complete evaluations or surveys
- you register for our email Newsletter
- you visit our website
- you contribute or subscribe to a TSC publication
- you join the TSC 50/50 Club

All data is treated as confidential and is password protected. We never pass data to anyone outside of those authorised to handle it unless you have knowingly and willingly authorised this.

The data we hold falls into 7 categories:

#### 1. Marketing

We hold a list of email addresses that we use to circulate our Newsletter. If you receive our Newsletter it is because you have specifically requested to be subscribed and have willingly provided your email address. You may unsubscribe at any time. On every email Newsletter we provide the recipient with the opportunity to unsubscribe using an automated link which results in immediate removal.

We use a marketing automation platform and email marketing service called MailChimp. The emails of our subscribers are stored on the MailChimp secure server. The MailChimp marketing automation platform is compliant with GDPR and has annually certified its agreement to EU/US and Swiss Safe Harbor Frameworks since 2007. The MailChimp Privacy Policy can be viewed at [www.mailchimp.com](http://www.mailchimp.com). Mailchimp provides us with statistical data to track the effectiveness of our newsletter marketing.

The data we hold for email marketing purposes is name and email address only, and nothing else. We treat the lawful processing of this personal data as being in our legitimate interest of advising the subscriber about forthcoming events, activities and news, and because the individual has given clear consent for us to process their personal data for this purpose. We believe that our 'opt-in'

methodology meets with the requirements of the e-Privacy Directive and that the 'unsubscribe' option described above, meets with the latest Data Protection Regulations.

## 2. Venue hire

When you contact us regarding venue hire we will obtain sufficient personal information to enable us to process your enquiry. If you enter into an agreement to hire part or all of the The Stithians Centre we will obtain sufficient information to enable us to identify you, ensure that you comply with our terms of hire, and to invoice you for the costs involved. In most cases this data will comprise name, address, telephone, email address and, where relevant, age. If your bank details are passed to us for any reason (eg. refund of a deposit paid), unless you expressly authorise otherwise, they will not be retained for any longer than needed for that purpose and your details will be removed from our banking records on completion of the task.

We may contact you periodically to advise you of opportunities to promote your event or activity.

Access to the Booking and Hire data is restricted to authorised members of the TSC Management Committee.

## 3. Participation in our events

When you book or attend one of our events we collect personal information that you provide to us which may include, name, address, postcode, email, telephone number and age. When you attend an event we may collect evaluation data from you. It is your choice whether to add your name or keep it anonymous.

Booking and ticketing for our events may be through a third party ticket agency. This privacy policy only applies to TSC. When you purchase tickets through a third party you should read their own privacy policies.

## 4. Website

When someone visits our website [www.stithianscentre.org.uk](http://www.stithianscentre.org.uk) we collect internet log information and details of visitor behaviour patterns using cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. You can remove cookies from your browser, however some of our website features may not function as a result.

Our website contains links to other websites. This privacy policy only applies to TSC so when you link to other websites you should read their own privacy policies. We cannot guarantee that external links will work at all times and we have no control over their availability.

## 5. Community Publications

When you submit an editorial or advertising contribution to The Stithians Times, or subscribe to The Stithians Times, we collect personal information that you provide to us which may include, name, address, postcode, email, telephone number and age.

If your personal details are listed in the online Stithians Directory on the TSC website it is because you have requested to be included and have knowingly provided your personal data for publication.

You may request modification or deletion of your details at any time by contacting the TSC webmaster [phil.blease@btinternet.com](mailto:phil.blease@btinternet.com)

## 6. Photography and video recording

We take photographs and videos at our events to showcase our venue, activities and audience participation. This is part of our 'legitimate interests' to market our organisation and work. The most common ways in which we use our photographs is on our website, newsletters, social media, occasionally in the local press, and in reports to charity commission, funders and stakeholders.

You can decline to be part of any photos or filming. If you attend one of our events where photos are being taken by Centre volunteers and do not wish any images published, you should inform the photographer of your concerns and contact details so that we can facilitate your wishes.

## 7. Membership of TSC 50/50 Club

Membership details will be kept securely on file for no more than 12 months after the last date you entered the draw. You may have your details removed at any time by writing/emailing your intention to stop playing to The Promoter, [phil.blease@btinternet.com](mailto:phil.blease@btinternet.com).

We announce names of winners of the draw on a Results email and may be used on Facebook, TSC website and newsletter unless requested otherwise in writing.

### **Children**

We do not collect the personal information of children under the age of 16 without parental consent. However, TSC is a community facility and is hired by other organisations including youth groups. This privacy policy only applies to TSC and you should always read the privacy and child protection policies of third party hirers and users.

### **How long do we keep your information?**

We will only retain your personal data for as long as we need to keep it. In considering how long to retain your data we will always take into account factors such as any ongoing obligations we have to you, the nature of our relationship with you, legal requirements, and contractual requirements. We will not keep your data indefinitely and will always dispose of it carefully when it is no longer necessary for us to retain it.

### **How do we share your information?**

We **do not** share your personal information with third parties unless we have your consent or to comply with a legal obligation. We do not sell, rent or share personal data to third parties for the purpose of marketing.

### **Legitimate Interests**

We treat the lawful processing of personal data as in our legitimate interests. The term 'legitimate interests' applies to the business interests that we as an organisation have in collecting, holding and processing your personal data to help us meet our charitable objectives. These do not supersede your personal rights and interests.

Our legitimate interests are:

- Direct marketing to you, ensuring you are aware of our events and that the marketing is relevant to you.
- Maintaining a relationship with you if you are a user or hirer of our venue, partner organisation, community group, artist, donor, funder or stakeholder, volunteer, a contributor or subscriber to a community publication published by TSC, member of the TSC 50/50 Club.
- Promoting our organisation, venue and community projects in order to meet our charitable objectives.
- Fulfilling our legal obligations as a charity.

### **How you can talk to us about your information?**

It is our obligation to treat any data we collect in accordance with GDPR regulations. If you are unhappy with the way we have dealt with your personal data or if you have any further questions about how we process and retain personal data please contact The Secretary, [stithcensec@outlook.com](mailto:stithcensec@outlook.com)

### **Your Right to Lodge a Complaint**

You also have the right to lodge a complaint with the Information Commissioner's Office, Phone 0303 123 1113 or online at [www.ico.org.uk](http://www.ico.org.uk)

### **Change in Policy**

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal data we will make this clear on the TSC website.