

## Art Projects for Schools Ltd. Data Processing Policy

9<sup>th</sup> October 2018 v02

**This document explains how we use your personal data.**

We are committed to safeguarding the privacy of the organisations that work with us.

### 1. How we use your personal data

1.1 This section provides you with details about:

- a) what personal data we may process;
- b) in the case of personal data that we did not obtain directly from you, where we obtained from, and what types of data we have collected;
- c) the purposes for which we may process your personal data; and
- d) the legal grounds on which we process your data.

**1.2 Account data.** We may process the personal data that a project organiser has provided to us when they register interest in undertaking a project with us. The account data may include the organiser's name, address, telephone number, email address and their role within the organisation. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communication. The data may also be processed for the purposes of enabling and monitoring the organisation's use of our services.

The legal basis for this processing is our legitimate interests in the organisation's successful participation in our project(s). Where you have provided your consent for us to do so, we may promote our other and/or future projects to the organiser and organisation.

Where the organiser has given us consent to process their information for the purposes detailed above, we will enter the account data into our CRM system and our accounting system.

**1.3 Contact data.** We may collect the organiser's details from third-party sources such as the organisation's website or GDPR approved lists on websites ("**contact data**"). We may do this where we identify an organisation as a potential participant for one or more of our projects. . We may use the publicly available or opt-in contact data to contact and organisation to ask whether it would like us to provide samples, other marketing materials or to provide feedback on the organisation's experience with us for one or more of our projects. The legal basis for this processing is our legitimate interest as a business to develop and maintain a successful relationship with an organiser and the organisation.

**1.4 Enquiry data.** We may process information contained in any enquiry an organisation submits to us regarding our services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to the organisation.

**1.5 Notification data.** We may process information provided to us for the purpose of subscribing to our email notifications, and/or marketing updates ("**notification data**"). The notification data may be processed for the purposes of sending the relevant notifications, and/or marketing updates.

**1.6 Correspondence data.** We may process the name, email address, home address, telephone number and any specific query information contained in or relating to any communication sent to us ("**correspondence data**") and store it in our CRM system and our accounting system. Our website, including a web-based chat, will generate correspondence data stored by a third party which we enter into the CRM system for the purposes of communication and record-keeping.



Please do not supply any other person's personal data to us, unless prompted to do so.

**1.7 Transaction data.** Any online payments made to us are processed through a third party payment provider ("**transaction data**"). The transaction data may include contact details, including billing and delivery address, and the transaction details. The payment information is only held by the payment provider, other the transaction ID and the authorisation code which we hold on our database.

The legal basis for this is processing a payment prior to producing and delivering an order.

**1.8 Order data.** We retain any data necessary for us to produce an order. This includes scanned images provided by an organisation as part of the project process. The scanned images may include personal information such as photographs and names. Access to scanned images is limited, monitored and logged.

For orders placed online we also retain personal information provided which is to be printed as part of the ordered products. The personal data can include names, ages and personalised greetings. This is obtained and retained from point of order.

We also retain the name and address of the person placing the order.

The legal basis for the above is the identification, monitoring, production and delivery of a placed order.

## **2. Providing your personal data to others**

**2.1 Where we provide personal data to any third party.** Where we share personal data with any third party we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.

**2.2 To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with.

## **3. Retaining and deleting personal data**

**3.1** Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain and delete your personal data in accordance with our Data Retention Policy.

**3.2** We may retain personal data where such retention is necessary for compliance with a legal obligation to which we are subject.

## **4. Amendments**

**4.1** We may update this policy from time to time by publishing a new version on our website and our online shop.

**4.2** We may notify project organisers of changes to this policy by email.

## **5. Your rights**

**5.1** You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) your request not being found to be unfounded or excessive, in which case a charge may apply;
- (b) you providing the name and address of the organisation on whose behalf you would have communicated with us, and
- (c) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

5.2 We may withhold personal information that you request to the extent permitted by law.

5.3 You may instruct us at any time not to process your personal information for marketing purposes.

5.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

5.5 The rights you have under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

**5.6 Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. Copies will be provided free of charge.

**5.7 Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.

**5.8 Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.

**5.9 Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you

still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

**5.10 Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

**5.11 Your right to object to direct marketing.** You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

**5.12 Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

**5.13 Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

**5.14 Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

**5.15 Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

## **6. Cookie Policy**

6.1 When you use our website, we use cookies and collect IP addresses. We use cookies to compile anonymous data about site traffic and site interaction so that we can offer better site experiences in the future.

6.2 Cookies are small files that a site transfers to your computer through your web browser (if you allow) that enables the sites or service providers systems to recognise your browser and capture and remember certain information.

6.3 Please note that during your visits to our website you may notice some cookies that are not related to Art Projects for Schools Ltd. When you visit a page with content embedded from, for example, Facebook or Twitter, you may be presented with cookies from these websites. We do not control the dissemination of these cookies. You should check the third party websites for more information about these.

6.4 Please refer to our Cookie Policy for the full information regarding the way in which we use cookies.

## **7. Our details**

7.1 We are registered in England and Wales under registration number 03578098.



7.2 Our registered office is at: Art Projects for Schools Ltd, Unit 3 Joseph Wilson Ind. Estate, Whitstable, Kent, CT5 3PS.

7.3 Email address: [info@apfs.org.uk](mailto:info@apfs.org.uk)

7.4: Telephone number: 0800 027 1939

7.5: Fax Number: 0800 019 5220

7.6 You can contact us:

- (a) by post, using the postal address given above;
- (b) by email, using the email address above;
- (c) by telephone, using the phone number above;
- (d) by fax, using the fax number above;
- (e) using our website, via Live Chat; or
- (f) using our website, via the contact form

## **8. Data Protection Officer**

The person dealing with data protection issues on behalf of Art Projects for Schools Ltd is Sonia Logan, who can be contacted via email: [sonia@apfs.org.uk](mailto:sonia@apfs.org.uk).



## **Art Projects for Schools Ltd. Data Processing Policy**

1.1 This policy has been designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

1.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

1.3 We will retain a project organiser's personal data for up to three years from the last contact with the organiser. At the end of the specified period the organiser's personal details will be deleted from our systems.

1.4 We will retain order data according to the requirements of each specific project. For the yearbook project the retention period is for up to two years after completion of the project, after which time order data will be deleted from our systems. For all other projects including the Christmas card project the retention period is up to one year after which order data will be deleted from our systems.

1.5 Notwithstanding the other provisions of this policy, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject.

### **Our details**

7.1 We are registered in England and Wales under registration number 03578098.

7.2 Our registered office is at: Art Projects for Schools Ltd, Unit 3 Joseph Wilson Ind. Estate, Whitstable, Kent, CT5 3PS.