

PRIVACY NOTICE

Introduction

Ina Boyle Society Limited (“the Society”) is a company limited by guarantee formed in the United Kingdom: its Company Registration Number is 12657186 The address of the Society is 2 Rheidol Terrace London N1 8NT.

The Society is what is known as a “Data Controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice.

Data Protection Legislation means the Data Protection Act 2018 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the European Economic Area. This includes any replacement legislation coming into effect from time to time.

This Privacy Notice explains how the Society processes and uses the personal data we collect which relates to you, what we do to keep it secure as well as the rights and choices you have over personal information about you.

What data do we hold?

We only collect information that we believe we will genuinely use for the purposes of (a) promoting interest in the life and works of the Irish composer Ina Boyle and other neglected Irish composers and encouraging and disseminating information about the performance and recording of her and their works (all these together are referred to “our purposes”) (b) the administration of the Society and (c) which is in accordance with data protection legislation. The Society may hold data relating to you from a number of sources. The majority of personal data we hold falls into one of the following categories:-

- You use our website
- You contact us about one or more of our purposes
- You donate money or services to us
- You attend or volunteer at one of our events
- You perform or record works of Ina Boyle or another composer within our purposes
- You write or lecture about or otherwise disseminate or communicate information related to our purposes
- You publish, print or edit or distribute copies of works or information related to our purposes
- You engage with us in any other way.

Our records may include:

- names of individuals
- postal addresses
- email addresses
- telephone numbers
- bank account and payment card details
- technical information related to your use of our website
- other personal details relevant to our purposes
- photographs
- plus any other information relating to individuals.

The legal basis for processing your data is based on one of the following:-

- your specific consent
- performance of a contract or compliance with a legal obligation
- our legitimate interests in (a) collecting, disseminating and analysing information relating to our purposes (b) the administration of the Society

On the above basis therefore we will not store, process or transfer your data except in accordance with the relevant legal basis referred to unless we have an appropriate lawful reason to do so.

In exceptional circumstances, we may wish to use your personal data for a different purpose than the one in relation to which it was collected. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

How we collect data from you

- If you log into our website, we obtain data about you then
- If you have asked us for information related to our purposes, we obtain data about you when you ask us.
- If you attend one of our events, we obtain data about you when you apply to attend.
- If you are a contractor or volunteer, we obtain data about you when you contract with us or when you agree to volunteer for us.

- If you are a donor, we obtain data about you when you contact us to make a donation.
- If you publish or otherwise disseminate information related to our purposes, we obtain data when we discover it and decide reasonably that it would be relevant to our purposes.

Communications may be sent to you by post, telephone, email, text or electronic means.

How long we keep your personal data

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes for which we collected it., including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain some of your relevant personal data for a longer period in the event of a complaint or for historical research or statistical purposes.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal regulatory, tax, accounting or other requirements.

If you have any questions about our data retention practices please contact our Administrator.

Lawful basis for processing

There are three bases under which we may process your data:

Contract purposes: When you enter into a contract with us, we need to process and store your data. For example, we will need to contact you by email or telephone for all purposes relating to the fulfilment of that contract.

Legitimate business interests: In many situations, we collect and process your personal information for purposes that are in our legitimate interests.

With your explicit consent: For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

How will we share your data?

We may share your personal data with third parties in the following circumstances:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights; or

- We may pass your information onto our third-party service providers, agents, subcontractors and other associated organisations for the purposes of carrying out or completing tasks and providing services in relation to our purposes. However, when we use third party service providers, we disclose only the personal information that is necessary for them to deliver the service and such providers are required to abide by Data Processing Agreements that require them to keep your information secure and not to use it for purposes outside those purposes for which we obtained the data.

- Data may also be disclosed to other external organisations acting as agents for the Society, for example mailing houses for the mailing of publications or approved volunteers acting on behalf of the Society.

The Society does not sell data to third parties or allow third parties to sell on data where data is shared with them.

How do we protect personal data?

Data security is important to the Society and to protect data relating to you we have put in place physical, electronic and managerial procedures to safeguard and secure such data.

Data relating to you is held securely on the Administrator's computers and within emails. The servers are accessible only to the Administrator concerned with the day-to-day management of the Society. The Society will ensure that appropriate Data Sharing Agreements are in place prior to sharing personal data with any third parties or external organisations as referred to in the previous section.

We take such security measures as we are able to in order to protect information relating to you including:

- Implementing access controls to our information technology
- Using appropriate procedures and technical security measures to safeguard your information across all our computer systems, networks and websites.

How we use your personal data for marketing purposes

We will add your details to our marketing database if:-

- You make an enquiry related to our purposes
- You attend one of our events or buy products or services from us
- You have told a third party that you would like them to pass us your contact details so that we can send you updates related to our purposes
- None of the above apply but we believe that events or products or services supplied by us may interest you and we can lawfully rely on the ground of legitimate interests to process your details.

We may send you marketing communications by email, telephone or post.

You can ask us to send you marketing communications by particular methods (for example you may be happy to receive emails from us but no telephone calls) or you may ask us not to send you any marketing communications at all.

You can check and update your current marketing preferences by calling or telephoning the Administrator as referred to below.

We never share your personal data with third parties for the marketing purposes of those third parties or other third parties.

Your rights

Right to Access Personal Information relating to you

You have the right to access the personal information that we hold about you in some circumstances, by making a request. This is sometimes termed ‘Subject Access Request’. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. If you would like to exercise this right, please contact us as set out below.

Right to Correct Personal Information relating to you

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it. If you would like to exercise this right, please contact us as set out below.

Right to Stop or Limit Our Processing of Data relating to you

You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances. If you would like to exercise this right, please contact us as set out below.

Right to Object to Processing of personal data relating to you

This may apply where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right to request the transfer of personal data relating to you either to you or to a third party.

We will provide to you, or a third party you have chosen, the personal data relating to you which we hold in a structured, commonly used, machine-readable format. Note that this right may only apply to automated information which you initially provided consent for the Society to use or where the Society used the information to perform a contract with you.

Right to withdraw consent at any time

This right applies where the Society is relying on your consent to process personal data relating to you. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you no longer wish to receive communications by post, telephone, text email or other electronic means, please contact the Administrator as referred to below. When contacting us please provide your name and other means by which we can identify you. Please also specify if you wish to unsubscribe from all communications or from specific communication types or channels. If you ask us to delete your data, we will maintain a skeleton record comprising your name and postcode to ensure that we do not inadvertently contact you in the future. We may also need to retain some financial records for statutory purposes (for example Gift Aid).

Photographs

We may take photographs of you at events related to our purposes which you attend as well. If you perform works of Ina Boyle or disseminate information about her or her works we may display on our website or store on our computer systems copies of photographs of you which we have legitimately obtained for our purposes. You have the right to see such photos of yourself and be provided with a copy of the images, although you may not use any such copy for any purposes without the permission of the copyright owner thereof.

In no case will we supply photographs to third parties, except those third parties who carry out legitimate services relating to our purposes for us.

Giving your reviews and sharing your thoughts

When using our website, you may be able to share information through social networks like Facebook and Twitter: for example, when you ‘like’, ‘share’ or review events or performances related to our purposes. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>. You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.



Other information

This Privacy Notice will be kept under review. Any changes will be updated on our website and communicated to you as appropriate. **This Privacy Notice came into force on 20 August 2020.**

The Society's Administrator is responsible for monitoring compliance with the relevant legislation in relation to personal data and can be contacted at 2 Rheidol Terrace London N1 8NT, Telephone Number 020 7354 1666 email address katierowan0000@gmail.com. You can contact the Administrator if you have any queries or concerns about the Society's processing of your personal data.