

Privacy Policy of Door in the Wall Arts Access CIC

Overview

At Door in the Wall Arts Access CIC ("we", "our", or "us"), the privacy and security of your personal details are very important to us. We are dedicated to handling your personal information accurately, keeping it safe, and using it solely based on your preferences.

Important Information

This policy details how Door in the Wall Arts Access CIC collects, processes, and handles your personal data via your interactions with our website and services, including but not limited to newsletter subscriptions, event registrations, and service purchases.

Children's Privacy

Our website is designed for adult users. We do not intentionally gather data from children.

The Role of Controller

We are the controller of your personal data and are committed to protecting your privacy as outlined in this policy.

Data Protection Officer

Our Data Protection Officer oversees our data privacy and protection strategies. Should you have any inquiries or concerns about this policy or our practices, please contact them using the provided details.

Tzipporah Johnston

Email: hello@doorinthewall.co.uk

Address: 26a Abercromby Place, Edinburgh, EH3 6QE

Phone: 0131 624 0084 or 07305853884

You can also lodge a complaint with the Information Commissioner's Office (ICO), the UK's data protection authority, although we request you contact us first to address your concerns.

Changes to This Policy

We regularly review and update our privacy policy. This version was last revised on 12/4/24.

Third-Party Links

Our website may link to external sites, which are not governed by this privacy policy. We recommend reviewing the privacy statements of these third-party sites.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - sign up to our newsletter or other marketing communications;
 - request further information to be sent to you;
 - enter a competition, promotion or survey;
 - apply for our commissioning and ally programmes;
 - express an interest in becoming a sponsor or partner; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Analytics providers such as Google based outside the UK;
 - Contact and Transaction Data from service providers such as Eventbrite, Humanitix, Mailchimp, Jotform and Google Forms who may be based outside the UK.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. When collecting special category data, we will always require explicit consent from you.

As a disability-led charity, we require different types of personal data to be collected, as specified at 2 above. This includes special category data which we must process in order to determine whether you are eligible to receive our support. The types of support that we offer to artists are:

- Membership of Neuk Collective (including visibility on the Members Directory)
- Participation in our events;
- 1:1 access consultations;
- Access to specific resources;
- Participation in our artist programmes;
- Commissioning and awards;
- Employment opportunities.

The types of special category data we process to determine who is eligible for this support are:

- disability and/or neurodivergence;
- race or ethnic origin;
- sexual history or orientation.

We may also process criminal convictions data and special category data for staff that apply to work at the charity. The types of special category data we process to determine eligibility for these roles are:

- disability and/or neurodivergence;
- race or ethnic origin;
- sexual history or orientation.

Data Retention

We retain personal data as long as necessary for the fulfilment of our services and legal obligations.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

When processing your special category data and/or criminal convictions data, we will only do so for the purposes stated in this privacy policy and with your explicit consent.

Your Rights

You have rights under data protection laws regarding the personal data we hold about you, including access, correction, erasure, and restriction of processing.

International transfers

Some of the external third-party service providers we use (including humanitix, MailChimp, Jotform and Google Forms) are based outside the UK so their processing of your personal data may involve a transfer of data outside the UK. You can find more information on how these companies handle your personal data on their websites. We only use international service providers who are GDPR-compliant.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Contact Us

For further information about our privacy practices or if you have any questions, please contact our Data Protection Officer at the details provided above.