

Privacy Policy

We value your privacy.

The most important things for you to know are:

- We will do everything we can to keep your information safe
- We will only use your information for the purpose for which it was given, i.e. the running of the school
- We will not share your information with anyone without your consent, unless there is a legal basis to do so
- We will never sell your information to a third party
- You can request to see the information we hold on you at any time

Who are we?

Innovations Theatre School is the trading name of Anne Shumate. Our registered address is 'Tanglewood' 11 Kirikee, Glenmalure, Co. Wicklow.

We are committed to protecting your privacy and will only use the information that we collect about you lawfully. This policy aims to give you an understanding of how and why we use the information you provide to us both online and otherwise.

What information do we collect and why?

We collect information that is **personal data**. Personal data is information that can be used to help identify you, such as (but not limited to) your name, email address, postal address, telephone numbers, family relationships, fee payment record and medical or other special needs. It also includes Internet Protocol (IP) addresses (the location of the computer on the internet), details of pages visited on our websites and files downloaded.

We collect information in the following ways:

- **Information you give us directly.** For example, when you complete a contact card or information form, contact us via our website, register for an event or subscribe to our mailing list.
- Publicly Available Information. We may combine information you provide to us with information available from public sources, such as (but not limited to) print, broadcast and online media or the Companies Registration Office,

How do we store and protect the information about you?

It is very important to us that any information we hold about you is safe. That's why we operate to a high level of security in relation to the collection, storage and disclosure of your information.

Information is stored on our database, in secure online storage or in paper files, which will always be stored securely, accessible only by authorised personnel who adhere to this policy.

The information we collect from you may be transferred to, processed and/or stored at a destination outside the European Union (EU). This may occur if, for example, one of our supplier's servers on which personal information is stored is located in a country outside the EU or if we use a cloud IT platform where data is dispersed between a number of different servers. These countries may not have similar data protection laws to Ireland but under the GDPR regulations, any data relating to EU residents is subject to the same protection regardless of where it is held.

How do we use the information about you?

Innovations Theatre School will use the information that we hold concerning you in accordance with the provisions of data protection legislation. We use this information to administer our relationship with you and to provide you with information about our activities.

We may use (or 'process') your personal data to:

- Plan student classes and activities
- Communicate with you (where we have a legal basis to do so) by post, phone, e-mail and SMS, to provide you with information about us, our classes, camps, events and any other information we think may be of interest;
- Keep a record of your relationship and correspondence with us, including financial transactions;
- Organise volunteer help for our activities;
- Manage your communication preferences;
- Deliver literature, resources, and other materials that you have requested from us;
- Comply with applicable laws and regulations, and requests from statutory agencies;
- Notify you about changes to this privacy policy.

Your Preferences: Our primary form of communication is SMS text message. You can choose at any time what communication you want to receive from Innovations and in which format. If there is something you would prefer not to receive, please email us at robert@innovations or contact us at the above address.

Dates of Birth: BCC may process dates of birth or age ranges for our students, information received via our registration form. We use this information to plan activities and to tailor our messages to you appropriately.

Sensitive Categories: If you choose to provide us with sensitive/special categories of personal data including, but not limited to, physical or mental health information, sexual orientation, personal history, your racial or ethnic origin, political opinions, religious or philosophical beliefs, we will only use this for the specific purpose for which you gave permission and where it is within our legitimate interests to process or where we have other legal grounds to do so.

Do we share this information with others?

Personal date is held and accessible only by the administrative staff. Teaching staff are only provided with contact details or personal information where it is necessary for them to have it.

We will not pass on contact details to anyone without your express consent.

We will not share or sell your personal data with any other organisations or individuals, unless there is a legal basis for us to do so.

We may allow our staff, professional advisors, consultants and/or external providers acting on our behalf to access and use your information for purposes within our legitimate interest (e.g. to deliver mailings, to analyse data, to process payments). These data processors have access to personal information needed to perform their functions, but may not use it for other purposes. Innovations will select only reputable third parties who will comply strictly with our instructions, with data protection laws, and will make sure that appropriate controls are in place.

Innovations Theatre School may disclose your personal information where we are under a duty in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

What is our legal basis for processing data?

Under the General Data Protection Regulation, there are six lawful bases to process personal data. We rely on a variety of these for using (or 'processing') data depending on the purpose for which the data is being processed.

Legitimate interest is about balancing the school's interests against your interests, rights and freedoms. Basically, it means that when you provide your personal details to us we may use your information for our legitimate interests to carry out our business. But before doing this, we will also carefully consider and balance any potential impact on you and your rights. We will not process data in ways that a reasonable person would not expect us to in the circumstances. We rely on legitimate interests for a variety of purposes, which include:

- Contacting you via mail, email or telephone about events which you may be interested in, based on your previous engagement;
- Contacting you to arrange volunteering schedules;
- Sending you updates in the post, when applicable;
- Saying thank you (by mail or telephone) to you if you volunteer or make any other contribution to the life of the school;
- Sending reminders about classes, payments, events and other matters.

You can let us know at any time if you would prefer not to receive these communications.

We use your express **consent** for all email communications from Innovations, given when you give us your data. Every electronic communication you receive from us will give you the option to unsubscribe. We use **compliance with a legal obligation** as the basis for processing any legally required activities such as reporting child welfare concerns.

How long do we keep your data for?

We will hold your personal data for as long as is needed to fulfil the function for which it was given, or for as long as is required by law for the relevant activity and for no longer than is necessary for the purposes for which it is processed, in accordance with our internal policies.

How will we inform you of changes to this privacy policy?

This privacy policy will be periodically reviewed and any updates published on our website www.innovations.ie. The date of this privacy policy update is at the bottom of this page.

What are your rights?

You will always have the right to:

- Be informed about how we use your data (via this privacy policy);
- Request a copy of the information that we hold about you (known as a Subject Access Request). If you would like a copy of some or all of your personal information, please contact us;
- Ask us to correct or remove information you think is inaccurate: we want to make sure that your personal information is accurate and up to date;
- Opt-out of receiving all or some of our communications, which includes any newsletters, appeals and event invitations;
- Request that we stop processing data about you for certain purposes (e.g. profiling) at any time by contacting us;
- Complain. Contact us at the addresses below.

Got questions?

You can contact us at <u>robert@innovations.ie</u> or by mailing us at the registered address: 'Tanglewood' 11 Kirikee, Glenmalure, Co. Wicklow.

This policy was last updated on 15th August 2018

Complaints Procedure

Handling Feedback and Complaints

Innovations Theatres School is committed to ensuring that all our communications and dealings with our customers and the general public are of the highest possible standard. We listen and respond to views offered so that we can continue to improve.

Innovations welcomes and encourages feedback. Therefore, we aim to ensure that:

- it is as easy as possible to make a complaint;
- we treat as a complaint any clear expression of dissatisfaction with our activities which calls for a response;
- we treat it seriously whether it is made by phone, letter, email or in person;
- we deal with it quickly and politely;
- we respond accordingly for example, with an explanation, or an apology where we have got things wrong, and information on any action taken;
- we seek to learn from complaints, use them to improve and monitor them at our board.

If you have feedback (including complaints) about any aspect of our work, you can contact our directors in writing or by telephone.

In the first instance, your feedback will be dealt with by our Administrative Director, Robert Holden. Please give as much information as possible and let us know how you would like us to respond to you, providing the relevant contact details.

Write to:

Robert Holden, 79 The Pines, Arlow, Co. Wicklow Y14 FN79

Email: robert@innovations.ie

Phone: 0871364219

What happens next?

We will acknowledge your feedback or complaint within 7 days, and do everything we can to resolve it within 21 days. If this is not possible we will explain why and provide a new deadline.

What if the complaint is not resolved?

If you are unhappy with our response, please keep in touch so that we can work towards a resolution. Complaints regarding our use of your data can be directed to:

Data Protection Commission, Canal House, Station Road, Portarlington, Co. Laois, R32 AP23, Ireland. Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +353 57 868 4757 | email info@dataprotection.ie