



# PRIVACY POLICY

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## Policy Purpose

Pinwheel is dedicated to processing only the personal data that is necessary for us to manage our business, in a way that respects and maintains privacy.

In this policy, you can see how we collect, manage and process personal data gathered and understand how and why it is used.

## The type of personal information we collect

We currently collect and process the following information:

- Names and email addresses of subscribers to our email mailing list
- Names, contact information and emergency information of participants
- IP address and information on what pages you have visited on our website and when

## How we get the personal information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have given us your name and email address when subscribing to our mailing list
- You have given us your name, address, email and telephone number when making an enquiry with our business, entered into a contract with us or participated in our work or projects
- You have accepted cookies when visiting our website, which track how you interact with our site

## What we use the personal information for

We may use your personal data in order to promote our events and services, and deliver on contracted activities. We also use it to monitor our services and ensure we are offering our customers a good experience.

## How long will we keep it?

If you have signed up to our mailing list, we will keep your data for as long as you are subscribed. You can unsubscribe at any time, or contact us and ask for your details to be removed.

Any data we hold will be kept for no longer than it is necessary, and consent to hold data can be withdrawn at any time.

### Who will we share it with?

We share some data with third party organisations who provide us with a service, in order to deliver our business activities. These organisations act as a data processor, providing you with a service on our behalf. They include:

- MailChimp, which is the service we use to deliver our email marketing
- Facebook and Google, in relation to the monitoring and analysis of website traffic and advertising campaigns
- YouTube and Vimeo, where you interact with a video that has been embedded on our website
- Eventbrite, in relation to specific projects or events
- We may need to share anonymised data such as the number of visitors to our website with funding bodies or partner organisations, but personal data will not be shared without your active consent

We may also sometimes send you information of events on behalf of our partners, if we think you might be interested. We will not share your data with them.

### What is the lawful basis for processing your data?

Under GDPR regulations, there are several lawful bases an organisation can use to process personal data. These are:

- **Consent:** the individual has given clear consent to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

The information below outlines the lawful basis for each data processing activity we undertake.

- Send you our email newsletter – Consent
- Send you a post-event survey about one of our events or activities that you have attended – Legitimate interest
- Process a job or volunteering application – Contract
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### Cookie policy

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We use Google Analytics and Squarespace insights to monitor traffic to our website. We regularly review how many people visit our website, which pages they look at and which external websites they have come from (referrers).

Website users who do not want cookies to monitor their devices can opt-out by installing a browser add-on that tells the website not to send information to these third parties, such as the Google Analytics Opt-out Browser Add-on.

### Photography and film

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### Your data protection rights

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**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

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We manage large scale outdoor events where photography and filming is likely to take place, in order to record the events for posterity, for future promotional activity (such as on our website and social media channels) and to provide evidence to our funders.

Photographs or film featuring a clearly identifiable individual or small group of individuals are subject to data protecting laws and we will gather written consent for this type of photography at our events. Visitors to our events will be notified that photography or filming is taking place through event signage and messaging on our website.

## How we store your personal information

We take all reasonable steps to ensure that your data is safely and securely stored.

Subscriber data for our mailing list is stored electronically within MailChimp. We may sometimes gather hard copy subscriber data at in person events, which is transferred to MailChimp. Hard copy data is then securely stored for five years before being disposed of.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

#### How to contact us

If you would like to find out more about the data we hold on you, or to request that data is deleted, please email us at [hello@pinwheel.org.uk](mailto:hello@pinwheel.org.uk) or write to us at Suite 2.2, Howard House Commercial Centre, Howard Street, North Shields, NE30 1AR.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

#### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [hello@pinwheel.org.uk](mailto:hello@pinwheel.org.uk) or write to us at Suite 2.2, Howard House Commercial Centre, Howard Street, North Shields, NE30 1AR.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>



## About Pinwheel

Pinwheel was established in summer 2019 to provide independent creative producing and consultancy services in outdoors arts, major cultural events and festivals. Its company number is 12145688.

With regards to data protection, Pinwheel is the data controller and manages any personal data gathered via this website and held within our mailing list.

Pinwheel Ltd

Address: Suite 2.2, Howard House Commercial Centre, Howard Street, North Shields, NE30 1AR

E-mail: [hello@pinwheel.org.uk](mailto:hello@pinwheel.org.uk)

This Privacy Policy was last updated on 13<sup>th</sup> July 2022.



# PRIVACY POLICY

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## Policy Purpose

Pinwheel is dedicated to processing only the personal data that is necessary for us to manage our business, in a way that respects and maintains privacy.

In this policy, you can see how we collect, manage and process personal data gathered and understand how and why it is used.

## The type of personal information we collect

We currently collect and process the following information:

- Names and email addresses of subscribers to our email mailing list
- Names, contact information and emergency information of participants
- IP address and information on what pages you have visited on our website and when

## How we get the personal information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have given us your name and email address when subscribing to our mailing list
- You have given us your name, address, email and telephone number when making an enquiry with our business, entered into a contract with us or participated in our work or projects
- You have accepted cookies when visiting our website, which track how you interact with our site

## What we use the personal information for

We may use your personal data in order to promote our events and services, and deliver on contracted activities. We also use it to monitor our services and ensure we are offering our customers a good experience.

## How long will we keep it?

If you have signed up to our mailing list, we will keep your data for as long as you are subscribed. You can unsubscribe at any time, or contact us and ask for your details to be removed.

Any data we hold will be kept for no longer than it is necessary, and consent to hold data can be withdrawn at any time.

### Who will we share it with?

We share some data with third party organisations who provide us with a service, in order to deliver our business activities. These organisations act as a data processor, providing you with a service on our behalf. They include:

- MailChimp, which is the service we use to deliver our email marketing
- Facebook and Google, in relation to the monitoring and analysis of website traffic and advertising campaigns
- YouTube and Vimeo, where you interact with a video that has been embedded on our website
- Eventbrite, in relation to specific projects or events
- We may need to share anonymised data such as the number of visitors to our website with funding bodies or partner organisations, but personal data will not be shared without your active consent

We may also sometimes send you information of events on behalf of our partners, if we think you might be interested. We will not share your data with them.

### What is the lawful basis for processing your data?

Under GDPR regulations, there are several lawful bases an organisation can use to process personal data. These are:

- **Consent:** the individual has given clear consent to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

The information below outlines the lawful basis for each data processing activity we undertake.

- Send you our email newsletter – Consent
- Send you a post-event survey about one of our events or activities that you have attended – Legitimate interest
- Process a job or volunteering application – Contract
- To carry out our obligations regarding a contract you have entered into – Contract

## Cookie policy

We use cookies to monitor traffic to our website and any microsites that we manage. A cookie is a small amount of data generated by a website and saved by your web browser, which is used to remember information about you. This information does not identify you as an individual but provides general information such as the city you live in and whether you are using a desktop or mobile device. We use this information to ensure our website is functioning well and provides our visitors with accurate and easy to use information.

We use Google Analytics and Squarespace insights to monitor traffic to our website. We regularly review how many people visit our website, which pages they look at and which external websites they have come from (referrers).

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