

**SACRED ARTS CAMP DATA PRIVACY POLICY 2023**

**1. Personal Data – What is it?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

**2. Who are we?**

We are Sacred Art Camp (SAC). We can be contacted at [hello@sacredartscamp.org](mailto:hello@sacredartscamp.org). For the purposes of the GDPR, we are the “controller” of all personal data we hold about you.

**3. What information we collect and why.**

Type of information	Purposes	Legal basis of processing
Community Member's name, age range, address, telephone numbers, e-mail address(es),	For managing the Community member’s membership within the Community. Community Emails and the Newsletters to provide the Community with Community news.	Performing the Community’s contract with Community Member’s. For the purposes of our legitimate interests in operating the Community. For the purposes of our legitimate interest in providing Community news.
Photos of Camp Life which may include images of Community Members	For use on the Community website, Community Social Media and Leaflets/Marketing Material.	Consent. We advised Community Members when and where photos were being taken at 2018 Camp for the Website and General Publicity in order that they could avoid their photos being taken. Community Member’s may withdraw their consent to photos being on the website at any time.
The Community Member’s name and e-mail address for the Community Contact List	Creating and managing the Community's Contact List for the Community to keep in contact with each other.	Consent. We seek the Member’s consent on the annual booking form. The Member may withdraw their consent at any time prior to the list being published by informing us they no longer wish for their details to appear in the Community Contact List. The Community Contact List is updated at each camp (yearly) and consent is requested each year.
Name and photo of Workshop Leaders	Information published on Community’s website	For the purposes of our legitimate interests in operating and promoting the Community. The information is updated yearly.

Name and photo of Community Holding Group member	Information published on Community's website	For the purposes of our legitimate interests in operating and promoting the Community. The information is updated yearly
Support to Attend Form	Submitted by Community Members seeking Assistance to Attend Camp. The support ranges from loans of equipment, visas, assistance with travel and the camp ticket costs, accessibility support.	Consent: The Community Member completing the form is aware the information is sent to our e-mail account managed by the admin team and then may be passed to the Holding Group for a decision. The Form is deleted from Incognito forms within 3 months after camp. The decision will be held on file for 3 years.

#### 4. How we protect your personal data

- 4.1 We will not transfer your personal data without your consent.
- 4.2 We have *implemented* generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments which we take from you online we will use a recognised online secure payment system; currently PayPal.
- 4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

#### 5. Who else has access to the information you provide us?

Your personal data will be treated as strictly confidential and will only be shared with other members of the community in order to carry out a service to other community members or for purposes connected with the community. We will only share your data with third parties outside of the community with your consent.

#### 6. How long do we keep your information?

We will hold your personal data on our systems for as long as you are a member of the Community. Your data is updated every year on annual booking forms. Any personal data we hold about you will be securely destroyed after 5 years of non-attendance at camp. Your data is not processed for any further purposes other than those detailed in this policy.

## 7. Your rights

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which SAC holds about you;
- The right to request that SAC corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for SAC to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

## 8. Further Processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## 9. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact us at [hello@sacredartscamp.org](mailto:hello@sacredartscamp.org)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.