

Anam Beo Arts Organisation

Document creation and review history			
Date:	Reviewed by:	Document amended:	Next day for review:
01 April 2022	Julie & Rowena	Created by Anna Carmody	

Link to all Anam Beo policies:

Environmental Policy & Procedures:

https://docs.google.com/document/d/1SZVMjyKnUKSZ2GPdDVguOZ45JHILXEMEKF7X8mktZ_s/edit?usp=sharing

Complaints Policy:

<https://docs.google.com/document/d/11VJnpycpPeTyof2wDq8wsVeQukWMCQXz9-80Kmbm7z0/edit?usp=sharing>

Safeguarding Policy for Children:

<https://docs.google.com/document/d/11VJnpycpPeTyof2wDq8wsVeQukWMCQXz9-80Kmbm7z0/edit?usp=sharing>

Volunteer & Employee Policy:

<https://docs.google.com/document/d/1AFiuGB3YeJj61U3HRIFDSyCMxKKo0rEtawo4TNcAbzE/edit?usp=sharing>

Vulnerable Adults Policy:

https://docs.google.com/document/d/1WHCe_s3ZWSH19QxHemKt_cWdmlqo7TSsnMhYg_8C8u4/edit?usp=sharing

Website GDPR Policies:

<https://docs.google.com/document/d/1x3VOVgqeufSeYBNJ4GYRD-mtdnpbr2mDhw9QTxX9NUE/edit?usp=sharing>

Incident Report Form:

<https://drive.google.com/file/d/1LFw0qJsh7oraASoPAZCK-xzPSlthKRHc/view?usp=sharing>

Infection Control Guidelines:

<https://drive.google.com/file/d/1LFw0qJsh7oraASoPAZCK-xzPSlthKRHc/view?usp=sharing>

Introduction

This document outlines Anam Beo's ("Anam Beo", "us", "we", and "our") processes for collecting and protecting personal data, and the ways that you can manage it, including the right to object to certain types of processing we carry out. All Anam Beo's data protection activities comply with the requirements of the relevant Irish Data Protection legislation, namely the Irish Data Protection Acts (1988 - 2018), and the ePrivacy Regulations 2011, as well as European legislation, in particular the General Data Protection Regulation (GDPR).

Anam Beo's as a Data Controller

In the course of its organisational activities, Anam Beo acquires, processes and stores personal data, in its capacity as Data Controller.

Data we collect

Direct interactions

Anam Beo collects data at events by providing a contact form for members of the public to fill, opting in to be contacted by us by email, telephone and/or post.

Website

Anam Beo's website does not store or capture any personal information beyond circumstances where the system logs IP addresses and other information provided by the visitor's browser. This may include the name and version of the browser and operating system, country from where you are browsing from, and any website address that referred you to our website. This information is only used for producing anonymous website statistics to help us improve the delivery of our online services. Our website asks you to provide personal data if you do any of the following:

- Donate through our secure online donation service provider I-Donate
- Fill in a GDPR compliant newsletter sign-up form
- Use the email option provided for contacting us

Online registration portal

Anam Beo collects personal data via its online portal for registration for Anam Beo services. The personal data that will be collected through the online portal relates to (i) the care centre registering with Anam Beo on behalf of a vulnerable adult, and (ii) the vulnerable adult themselves. Both these individuals are data subjects. - In respect of the carer/vulnerable adult registering with Anam Beo for Anam Beo services on behalf of the vulnerable adult, we may collect the following personal data: name, email address and telephone number, emergency contact information - In

respect of the adult being registered for Anam Beo services, we collect the following personal data: name, date of birth, gender, data relating to health is considered special category personal data under EU data protection law and therefore this data is subject to additional safeguards and protections. To the extent that we process any special category data, we do so on the basis of exercising our duty of care towards vulnerable adults using our services and necessity for defence of any legal claims which may arise.

Cookies

Cookies are small pieces of information stored on your browser when you visit our website. The Anam Beo website sets the name of the cookie, what information is stored in the cookie and how long the cookie is kept by your browser. The Anam Beo website uses session cookies. A session cookie only remains on your computer until you close your browser. This cookie is not used to identify you personally in any way. We use this type of cookie to collect aggregated website statistics that allow us to understand how visitors use the site. All the information collected is anonymous and is only used to analyse usage and improve services. If you prefer, you can visit and view our site without cookies by adjusting your browser settings. If you do disable cookies, some site functions might not work correctly

Mailing List

When you sign up to receive emails from us, and consent to receive news about our latest projects supporting the arts and community settings across Ireland, our various public events, fundraising activities & campaigns and any other news that is relevant to Anam Beo's development. We use MailChimp to deliver our newsletter and gather statistics around email opening and clicks using their insight tools to help us monitor and improve our newsletter. For more information please see MailChimp's privacy policy here: <https://www.intuit.com/privacy/statement/>.

Social Media

Anam Beo uses Facebook, Twitter, LinkedIn and Instagram to further reach members of the public, supporters and followers and share information about our work. Each of these sites has their own privacy policy and terms of use that individual users are responsible for ensuring they are aware of and have set privacy settings to suit your needs. Depending on your settings or the privacy policies for social media services, we may have access to your personal information on those accounts when you message us. We will only use this information for purposes that are within the limits of Data Protection legislation and the privacy policies of social media sites. We also collect and track anonymised data on our social media audiences to better understand the profiles and behaviour of people who engage with us online.

Children's Personal Data

For any child registering with Anam Beo as an artist or volunteer under the age of 18, we acknowledge that they are all below the legal age for giving consent to the processing of their personal data. All of our data collection and processing activity therefore is undertaken in the understanding that it will be directed and responded to by the parent/guardian in the children's life that will be using it. Any personal data that we request about the children who take part in our

activities - including taking pictures and video - will always be gathered with the express consent of the parent or guardian.

How data is used

We will only use your personal data for the purposes set out below.

We will use your personal data in the following circumstances:

- For the purposes of performing contracts entered into by Anam Beo. Where we need to perform the contract we are about to enter into or have entered into with you, we rely on contractual necessity for the processing of personal data related to those contracts. These contracts include:
 - (i) Contracts with care centres: we process personal data for the purposes of performing the contracts we enter into with carers for the provision of Anam Beo services. We process the carers name, email address and telephone number for the purpose of providing the Anam Beo Services.
 - (ii) Contracts with sponsors, donors and volunteers: we process personal data for the purpose of performing the contracts we enter into with sponsors, donors and volunteers. We process those individuals' names, contact details and (where relevant) their payment information for the purposes of performing the contract entered into with them, such as for sponsorship, donation and/or volunteer purposes.
- Compliance with legal obligations: We process personal data for compliance with our legal obligations, in particular our Health and Safety obligations in respect of the vulnerable adults to whom we provide Anam Beo services.
- We process personal data where required in line with our legitimate interests: we process information collected by Anam Beo's website for website analytics purposes only (to help us gather and analyse information about the areas visited on the website in order to evaluate and improve the user experience and the website), unless you give us consent for your information to be used in other specific ways. We use your personal data in this way on the basis of our legitimate interests in operating an efficient website tailored to our users.
- We process personal data for the specific purposes for which you provided your consent: these purposes might include providing your email address and information about you or your organisation so that we can contact you, so that you can donate to Anam Beo, so that you can register for an event, and/ or so that we can provide you with updates about our work and events.
- We process personal data for the purposes of corresponding with our supporters: Anam Beo stores the contact information of donors, supporters and sponsors who have consented to give their information, in order to send correspondence containing information relevant to the work supported.
- We process personal data for marketing purposes on the basis of your express consent: Where you have specifically consented to our use of your personal data, for example to send direct

marketing communications to you via email, we will process your personal data for those specific purposes. You have the right to withdraw your consent to marketing at any time by unsubscribing from our newsletter or contacting us.

Anam Beo never sells or rents personal data to third parties. We will not share your personal information with an unauthorised third party unless required to do so by law. Third Party Processors in the course of its role as Data Controller, Anam Beo engages a number of Data Processors to process Personal Data on its behalf to assist it in providing its services, such as by providing technology services and solutions. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged.

These Data Processors include:

Data processor	Services provided to Anam Beo
iDonate	Donation Processing
Mailchimp	Manage mailing lists, e-newsletters, emarketing campaigns and automations
Eventbrite	Managing occasional event bookings
Wordpress	Website platform
Google Services, including Workspace and Youtube	Intranet, word processing, team collaboration. Youtube: video content and sharing

Data Retention and Destruction

Anam Beo will retain your data for as long as is necessary for the purpose specified. For those signing up to our mailing list, we will keep data for as long as necessary for the purpose of sending your marketing communication and to keep a record of any opt-outs, allowing you to request that you stop receiving emails from us, as when you feel appropriate. Artist photos will be used for promotional purposes for no more than five years, and in many cases, less. After five years, photos will only be held for archival and reporting purposes. For those entering into a contract with Anam Beo, applying for volunteering or job opportunities or any other specific short term purpose, we will only hold the information for the duration of the specified purpose , unless consent has been given to retain the information in question, such as in order to contact you. When your data can no longer be held, or if you request that we remove information we hold on you, all information relating to you will be securely and fully removed from any system on which we are holding your information.

Your Rights

You have several rights in relation to your personal data.

Right of access

You have a right to request access to your personal data and to be provided with a copy of certain information including the categories of your personal information we collect and disclose. Right of rectification - You have the right to request that we rectify inaccurate personal data about you.

Right of erasure

You have the right, in certain cases, to request that we delete your personal data, provided there are valid grounds for doing so and subject to applicable law.

Right to data portability

You may have the right to receive certain of your information in a structured, commonly used and machine-readable format and to transmit such information to another controller.

Right to object (marketing)

You have the right to object to processing for direct marketing purposes at any time. Anyone may request that they be removed from our email list and that they not be contacted again by contacting Anam Beo directly (see details below), or by unsubscribing from our email list - this option is available at the end of any marketing email you receive from Anam Beo.

Right to object (legitimate interest)

Where we process your personal data based on legitimate interests, you can object to this processing in certain circumstances. Unless we have compelling legitimate grounds or where it is needed for legal reasons, we will cease processing your information when you object.

Right to restrict processing

You have the right, in certain cases, to temporarily restrict the processing of your information by us, provided there are valid grounds for doing so.

Right to withdraw your consent

Where we have sought your consent for certain processing activities, you have the right to withdraw that consent at any time. Please note that the lawfulness of any processing undertaken prior to your withdrawal of consent shall not be affected by the withdrawal.

Right to complain

You also have the right to lodge a complaint with Anam Beo's lead supervisory authority, the Irish Data Protection Commission or your local supervisory authority for data protection. However,

these rights may not be exercised in certain circumstances, such as when the processing of your data is necessary to comply with a legal obligation or for the exercise or defence of legal claims.

We will process your requests to exercise any of the above rights as soon as possible. You may be asked to provide evidence of your identity.

If you have any questions about this privacy policy, or if you require further information about our use of your personal data or you wish to avail of any of your rights set out herein, please contact Anam Beo at:

Anam Beo, No.1 Oxmantown Mall, Birr, Co. Offaly addressed to the Data Protection Officer.

Updates to this policy This policy will be reviewed and updated from time to time, particularly to maintain compliance with evolving data protection laws, regulations, and needs.

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