



Charity Number 1094820

Company number 04298302

# Privacy Policy

*Introduction: Sandwell Third Age Arts STAA is a charity (charity number 1094820) and a company limited by guarantee (company number 04298302). We are a professional arts organisation providing arts experiences to improve people's health and well-being and to enrich peoples' lives. We work with people of all ages from all walks of life. We specialise in supporting carers, older people with mental health needs and people with dementia. We deliver arts and cultural events so people have opportunities to be creative, connect with their communities, and access arts and culture. We are based in West Bromwich and work with people living in Sandwell and in the wider West Midlands Region. We use professional artists to ensure the quality and excellence of our services.*

STAA is committed to protecting and respecting your privacy. STAA takes your privacy very seriously and we ask that you read this policy carefully as it contains important information on the personal information we will collect about you, what we do with your information, and who your information might be shared with.

STAA is a Charity, charity number 1094820 and a company limited by guarantee incorporated in England and Wales, company number 04298302. Its registered office is at 9<sup>th</sup> Floor, West Plaza, 144 High Street, West Bromwich B70 b6JJ. STAA is a 'data controller' for the purposes of the applicable data protection law in the UK, which means we are responsible for, and control the processing of, any personal information we collect from you.

## Information we may collect about you.

Personal information provided by you: The information you give us may include personal information such as your name, address, email address, telephone number, and date of birth and bank details (in the case of artists and contractors working on behalf of STAA and/or individuals who may pay for a service delivered by STAA and contractors may be asked to give a photographic image of your face for identification purposes. Photographic images may be collected during the delivery of STAA's services to document the activity or event which may identify individuals. You may give us your information by filling in forms including those on our website ([www.staa.org.uk](http://www.staa.org.uk)\*) or by corresponding with us in writing, by telephone, email or otherwise.

\*We do not currently collect information through our website using 'cookies'.

Personal information provided by third parties: We may receive personal information about you from third parties, which may include parties who provide this information in fulfilment of a legal obligation or representatives you have authorised to act on your behalf. Any information we receive about you from these third parties will only be processed for the purposes described under 'What we do with your data' section below.

## Why we need your data.

We need your basic personal data in order to provide you with on-going organisational updates about the services STAA is delivering such as notices about new and on-going services, meetings, changes to



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policies, and to communicate with you about upcoming events, exhibitions and other developments connected with the work of the charity. In summary we need your data for the administration of the services we may provide to you and in the management of the individuals contracted by STAA to deliver work and services on behalf of the charity. This includes contacting you to provide you with information and updates you have requested about these activities.

### **What we do with your data**

Personal data we collect is processed by STAA's co-ordinator. The co-ordinator keeps paper and electronic records about the people who work for STAA and the people who we deliver a service or services to. Some data concerning a person's contact details and financial information is processed by the finance team of the Charity Sandwell Community Caring Trust on behalf of STAA. This is to administer payments for work delivered on behalf of STAA. We may process the information we collect about you for the administration of services we may provide to you; to respond to any communications that you send to us; to provide you with information about other services we offer that are similar to those that you have previously utilised or enquired about from us.

We may need to disclose your personal data to our agents and sub-contractors to help us to fulfil our purposes described in the 'why we need your data' section above. For instance this could be to an artist/contractor who will be delivering a service to you on behalf of STAA so that they can tailor the service to fulfil your particular needs and requirements. We may also need to disclose your personal data to law enforcement agencies, regulatory bodies, auditors and professional advisers to comply with any legal obligation; or protect the rights, property, or safety of STAA, its trustees, and participants in its services or others; or to obtain any related professional advice. We will take all steps reasonably necessary to ensure your personal data is treated securely and in accordance with this privacy policy.

### **Sensitive Personal Information (Special Category Data)**

We do not ask you to provide us with information regarding your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data, sex life or sexual orientation. We may need information about your health and well-being as some of our services are targeted at specific groups of people who may be experiencing certain health conditions. If it is necessary to obtain this information from you in relation to our service delivery or to perform a contract with you, we will only collect and process the information with your explicit consent and only for the purpose specified by you when giving your consent.

### **How long we keep your data.**

We will not keep your personal data for longer than is necessary. The criteria we use for determining the retention periods for your personal data will be any regulatory requirements, statutory retention periods or guidance provided by regulatory bodies such as HMRC or the Information Commissioners Office. For example, the personal data that is collected from you to administer our financial services will be deleted 6 years after as this is generally the statutory limitation period for legal claims related to most contracts.

***Please note that as part of STAA's safeguarding risk management programme, some information about you may be held for a long period of time, up to 50 years, as demanded by our insurers.***



## What are your rights?

- You have the right to request a copy of your information which we hold (this is known as a subject access request). You must do this in writing to Sandwell Third Age Arts STAA, 9<sup>th</sup> Floor West Plaza, 144 High Street, West Bromwich, West Midlands, B70 6JJ. We will respond to you within the time frame specified within the applicable data protection law, which is generally within one month of receipt of the written request. We will provide the information without charge, but we may charge a reasonable fee for the administrative cost of providing the information where the request for information is excessive.
- You have the right to correct any mistakes in your information: You can require us to correct any mistakes in your personal data which we hold about you. Should you require us to rectify any inaccuracies please send a written request to the address above. We will respond to you within the time frame specified within the applicable data protection law, which is generally within one month of receipt of the request. If we have disclosed your personal data to any third parties, we will also inform those third parties of any correction to your personal data where possible.
- You have the right to ask us to stop contacting you about any services and events that STAA is delivering.
- Where we have relied on your consent for the processing of your personal data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent please email STAA at [info@staa.org.uk](mailto:info@staa.org.uk)
- If at any point you believe the information we process on you is incorrect you can request to see this information and have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated.
- If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office <https://ico.org.uk/>

April 2018

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This policy is reviewed annually.