



# FIRKIN CRANE CLG PRIVACY POLICY

Updated May 2018

## Who we are:

Name: Firkin Crane CLG

Address: John Redmond Street, Shandon, Cork

Contact: [info@firkincrane.ie](mailto:info@firkincrane.ie) / 021 4507487

Firkin Crane stores and processes personal data within the organisation (Ireland only)

## Processing Personal Data:

We process personal data for the following purposes:

- Client Administration, which includes data collected from
  - Parental consent forms
  - Attendance sheets
  - Contact forms
- Direct Marketing, which includes data collected from subscription buttons on
  - Firkin Crane website
  - Firkin Crane Facebook page
  - Company emails
- Photography and video documentation for promotion and marketing online and in print, we will only do this
  - When permission is given by the parent in children under 16 (directly through Firkin Crane)
  - When images and video documentation are given expressly for promotion of upcoming events/activities
- Provision of services, this includes
  - Events programmed by Firkin Crane
  - Studio Rental
  - Theatre Hire
- Legal obligations, this includes personal data required for
  - Drawing up of contracts
  - Insurance purposes
  - Garda Vetting Purposes
- Employee administration

The legal basis for processing this data is:

- Consent
- Legitimate interests, which include
  - Class participants
  - Audience
  - Partners
  - Artists
  - Suppliers
- Performance of a contract, (failing to provide this information will prevent the drawing up of a contract)
- Legal obligations, (where this information is vital to the completion of forms, e.g. Garda Vetting Forms)
- To protect the vital interests of the data subject

Personal data is disclosed only to:

- Employees (as needed)
- Approved Contractors/Developers appointed by Firkin Crane if needed to perform a specific job

We do not transfer personal data to any third parties / outside Ireland.

### **Data Retention Period:**

We retain personal data as follows:

- Data stored online via Firkin Crane's mailing list using Mailchimp will be retained for a period of 2 years before the data subject will be given the option of having their data retained beyond this period or deleted.
- Data, including names, emails and phone numbers will be stored using an internal database, ongoing.

### **Your Rights as an individual:**

You have the following rights in respect to the personal data that Firkin Crane holds on to. Please contact us at the address above to exercise any of these rights:

1. The right to be informed
  - You have the right to "fair processing information"
2. The right of access
  - You have the right to obtain:
    - Confirmation of your personal data being processed
    - Access to a copy of your personal data
    - Any other supplementary information
3. The right to rectification
  - You have the right to have your personal data corrected if it is inaccurate or complete
4. The right to erasure (includes withdrawal of consent)
  - You have the right to have your personal data erased, in the following circumstances:
    - You withdraw consent
    - The personal data has to be deleted to comply with a legal obligation
    - The personal data was unlawfully processed

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected
  - Where you object to the processing and there is no superseding legitimate requirement to continue the processing
  - The personal data is processed in relation to the offer of “information society services” to a child
5. The right to restrict processing
    - You have the right to ‘block’ or suppress processing of personal data
  6. The right to data portability
    - You have the right to obtain and reuse your personal data for your own purposes across different services
  7. The right to object
    - You have the right to object to:
      - Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
      - Direct Marketing (including profiling)
      - Processing for purposes of scientific/historical research and statistics
  8. Rights in relation to automated decision making and profiling
    - You have the right not to be subject to a decision when:
      - It is based on automated processing
      - It produces a legal effect or similarly significant effect on the data subject

### **The Right to Complain:**

If you feel that Firkin Crane has not fulfilled its obligations under the General Data Protection Regulation 2016/679, then you have the right to lodge a complaint with the Data Protection Commissioner (DPC).

The DPC offers guidance on how to make a complaint here:

<https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm>

### **Automated decision making, including profiling:**

Firkin Crane does not use any automated decision making or profiling