



dlr MILL THEATRE
D U N D R U M

PRIVACY POLICY

CONTENTS

- LEGAL STATEMENT
- PRIVACY COMMITMENT
- PRIVACY STATEMENT
- DATA PROTECTION PRINCIPLES
- RESPONSIBILITY
- DATA MANAGEMENT
 - ACCOUNTING AND ADMINISTRATIVE RECORDS
 - MEMBERS AND SUBSCRIBERS
 - OPERATION OF THE CHARITABLE DONATIONS SCHEME OF TAX RELIEF
 - OPERATION OF OTHER SCHEMES AND INITIATIVES
 - RESEARCH SURVEYS AND POLICY CONSULTATIONS
 - COMMUNICATIONS AND INFORMATION STORAGE AND RETRIEVAL
 - INFORMATION GATHERED ON The Mill Theatre Management CLG WEBSITE
- PROCEDURES AND GAUIDELINES
 - REPORTING A DATA BREACH
- REVIEW

LEGAL STATEMENT

The Mill Theatre Management is a Company Limited by Guarantee); company registration no: 413655; CHY (revenue) no: 17019; RCN 20062552

PRIVACY COMMITMENT

We are aware that as a customer, client, and member of our community you care about the security and privacy of your information.

The Mill Theatre Management is a Company Limited by Guarantee, No. 413655 and a Registered Charity (RCN 20062552). Mill Theatre, Dundrum Town Centre, Dublin 14, Republic of Ireland 01 296 9340
info@millTheatre.ie

Any personal information that you volunteer to The Mill Theatre Management CLG, either as a member, trustee, employee, contracted provider, attendee, donor, website user, mailing list subscriber or any other user will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Act, 1988, as amended by the Data Protection (Amendment) Act, 2003.

Data Protection is 'the safeguarding of the privacy rights of individuals in relation to the processing of personal data, in both paper and electronic format.' The General Data Protection Regulation (GDPR), effective from May 2018, details how personal data can only be gathered legally under strict conditions, and for legitimate purpose. Under GDPR, 'data' means information in a form in which it can be processed, automatically and/or manually.

The different classes of data are:

- Automated Data – information processed automatically
- Manual Data – information recorded as part of a filing system or with that intention
- Personal Data – related to a living person who could be identified, directly or indirectly from the data
- Sensitive Personal Data – relating to origin, opinions, beliefs, memberships, affiliations, health, sexual orientation, offence history, and court proceedings.

The Mill Theatre Management CLG has developed the following Data Protection Policy to ensure we comply with our Data Protection and Privacy Policy responsibilities.

PRIVACY STATEMENT

Privacy and data protection rights are important to The Mill Theatre Management CLG. We are committed to safeguarding the privacy rights of all our officers, employees, members, service users, contractors, and donors.

The Mill Theatre Management CLG is committed to protecting the privacy of all individuals in relation to the processing of personal data that we may collect, access, and use and/or disclose. Any personal information that is volunteered to, or sought by, The Mill Theatre Management CLG will be treated with the highest standards of security and confidentiality in accordance with data protection law and regulation and at all times following best practice.

DATA PROTECTION PRINCIPLES

The Mill Theatre Management CLG performs its responsibilities under GDPR and the Data Protection Acts in accordance with data protection principles:

- Obtain and process information fairly
 - We always collect and process personal information fairly and in accordance with statutory and other legal obligations.

- Keep it only for one or more specified, explicit, and lawful purpose
 - We keep personal data only for the purposes that are specific, lawful and clearly stated; personal data is processed only in a manner compatible with these purposes.
- Use and disclose only in ways compatible with these purposes
 - We use and disclose personal data only in circumstances that are necessary for the purpose for which we collected the data.
- Keep it safe and secure
 - We take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data, and against its accidental loss or destruction, and take all precautions in our power to protect personal information.
- Keep it accurate, complete and up-to-date
 - We adopt procedures that ensure high levels of data accuracy, completeness and where it is required to be kept, ensure data is up-to-date.
- Ensure it is adequate, relevant and not excessive
 - We only hold personal data to the extent that it is adequate, relevant and not excessive.
- Retain it for no longer that is necessary
 - We destroy any inactive data, hold active data for a maximum period of 7 years and have clear procedures for the destruction, and not the archiving, of personal information.
- Give a copy of their personal data to that individual on request
 - We have procedures to ensure that data subjects can exercise their rights under data protection legislation to access and amend or remove their data at any time.

RESPONSIBILITY

Overall responsibility for ensuring compliance with data protection law rests with the board of directors. Any employee responsible for the collection and use of personal data is also individually responsible for compliance.

The Mill Theatre Management CLG's Data Protection Officer is Kate Canning, Artistic Director, and is responsible for co-ordinating support, assistance, advice, and training within the organisation to ensure that we comply with relevant legislation and regulation. This person can be contacted by telephone on 01 296 9340 or by email to kate@milltheatre.ie

DATA MANAGEMENT

The Mill Theatre Management CLG collects, processes and maintains data for a number of purposes: (add or delete as appropriate)

1. To perform accounting and other administrative record keeping functions

2. To undertake communications in providing services for members and users
3. To process tax relief on qualifying donations made to The Mill Theatre Management CLG, as an eligible charity under the Charitable Donations Scheme.
4. To process applications for funding and commissions managed by The Mill Theatre Management CLG
5. To conduct research and consultations
6. To monitor company communications and the use of data storage and retrieval systems
7. To gather statistics on traffic and usage of our website and social media.

ACCOUNTING AND ADMINISTRATIVE RECORDS

For the purposes of administration and management, and to comply with employment and tax law and regulation, information regarding employee terms and conditions and other HR records are both held in a secure location for period of 8 years, on computer and in manual files.

- **Employees**

All employee personal information is treated confidentially and is accessible only to Kate Canning, Artistic Director and Shona Ashmore, Theatre Manager within strict security protocols.

Personal information will not be published or disclosed to any third party without consent, except where it is necessary to comply with statutory obligations or where the organisation is acting on behalf of The Mill Theatre Management CLG with its consent. Internally, information may be made available to the Board as circumstances dictate.

To ensure records are kept up to date, employees and directors will be routinely reminded that they should advise the company of any change(s) to their personal details.

- **Directors**

The records held in relation to the directors of the company include personal information. Records are required to be held by: the Revenue Commissioners (for charitable tax exemption purposes); the Companies Registration Office (registration requirements); external auditor (Anti-Money Laundering and due diligence); and, the company's bankers (beneficial ownership; account mandate records). Additional information may also be held in the Directors' Register of Interests.

Access to board records is restricted to the company secretary, and as necessary the Chief Executive and Chairperson. Details of any interests disclosed in accordance with The Mill Theatre Management CLG's internal code of conduct will be kept in a confidential register to which only the Chairperson and, at the discretion of the Chairperson, the Chief Executive will have access.

All declarations of interests and conflicts of interest are contained within each director's public profile on website.

- **Mailing List Subscribers**

Subscribers to mailing lists will always have the option to unsubscribe at any time. An unsubscribe link will be available at the base of every email sent to subscriber lists. The Mill Theatre Management CLG will always ask whether respondents want to opt out of or to receive any additional promotional emails and other mailings about other events and services.

Subscriber information will not be disclosed to any external third party, without consent, except where it is necessary to comply with statutory requirements or where an organisation is acting on behalf of The Mill Theatre Management CLG, with its consent.

OPERATION OF THE CHARITABLE DONATIONS SCHEME OF TAX RELIEF

The Mill Theatre Management CLG is approved to operate the Charitable Donations Scheme under Section 848A, Taxes Consolidation Act, 1997 and is an eligible body for tax exempted donations to Charitable Bodies. It seeks and collects PPS numbers and other information from individual donors.

The Mill Theatre Management CLG is committed to the standards in the Statement of Guiding Principles for Fundraising, as drawn up by the Irish Charities Tax Reform Group. The protection and security of donor information, and the following conditions are strictly adhered to with regard to the operation of the Donation Scheme:

- PPS numbers received in respect of specific donations are not used for any other purpose other than the claim for relief for that specific donation;
- PPS numbers received for the purpose of claiming relief under the Donation Scheme are not integrated into any member or donor database;
- Any PPS number so collected are held in a restricted-access file, separate to any member or donor database;
- CHY2 Certificates issued to a donor will never have a PPS number pre-printed on the form;
- Once returns are made and The Mill Theatre Management CLG receives the relief due, the PPS number is retained in line with Revenue audit requirements (currently, for 6 years).

OPERATION OF OTHER SCHEMES AND INITIATIVES

The Mill Theatre Management CLG may seek, collect and process personal information as part of its management of devolved funding schemes and application processes for external commissions, residencies and other opportunities it might manage. Information is sought

voluntarily and collected through responses to open call expression of interests and application forms.

As well as a commitment to clear operating policies and transparent decision-making processes in regard to applications, The Mill Theatre Management CLG acknowledges its responsibility to safeguard any personal information gathered. Data is held in manual and electronic files. Files and records are the responsibility of the relevant manager and access is restricted. Information requested by funders and commissioners may be made available to them, and internally to other officers, as circumstances dictate. Personal information shall not be disclosed to any external third party, without consent, except where it is necessary to comply with statutory requirements, or where an organisation acting on behalf of Dance Ireland, with its consent. Where data is stored beyond the period of its original purpose, all personal information will be anonymised.

Individuals and organisations making applications to The Mill Theatre Management CLG must agree to opt into other communications and mailing lists before their contact details can be processed and used for this purpose. The following statement will be included in application forms:

Please note, unless you indicate otherwise, information you provide will be maintained in a database maintained by The Mill Theatre Management CLG to inform you about its activities and services. This includes sharing relevant information via our ebulletin and by email to assist our staff connect, network and organise events. I agree to allow The Mill Theatre Management CLG to store my contact details for these specific purposes. Yes/No.

RESEARCH SURVEYS AND POLICY CONSULTATIONS

From time to time The Mill Theatre Management CLG conducts audience, industry and policy research. We may seek personal information from individuals including name, contact details, background information, skills, qualifications, experience and professional data.

Personal information collected anonymously for research purposes, and research data that has been de-identified, does not come within the terms of data protection laws.

Research data may be used for a purpose other than that for which it was collected provided that this is also a research purpose. As well as ethical considerations, privacy rights prohibit the processing of personal data without prior consent. Research information will not be disclosed to any external third party, without de-identification, except where it is necessary to comply with statutory requirements or where an organisation is acting on behalf of The Mill Theatre Management CLG and with its consent.

Where information cannot reasonably be anonymised, without compromising the research aim, participation in research will always be voluntary and respondents will always be offered the option not to disclose any personal information being sought. Staff or external researchers undertaking research work will be made aware of the requirements for proper management of personal information they collect and the need to ensure data protection principles are respected. The research supervisor will be the custodian of research data and will be responsible for its management including security, storage and retention, and for informing research participants of research obligations in relation to personal data.

Appropriate levels of security will be established, including protection from unauthorised access of any data stored. The research supervisor will make arrangements for data retention on a project by project basis, taking into consideration any legal obligations or funding conditions. Once the retention period has expired, personal data will be disposed of or deleted securely and confidentially.

COMPANY COMMUNICATIONS AND INFORMATION STORAGE AND RETRIEVAL

The company's Information Communications & Technology (ICT) systems, local area network and server, personal computers, laptops, telephones, software, email systems, internet access, back-up records and archives – are important work facilities and provide essential contact, communications and ICT capabilities internally and externally.

To ensure that we are able to use the ICT systems to their optimum:

- Employees must ensure that data protection requirements are respected
- Where employees become aware that a breach may occur or has occurred they should report this without delay to the Data Protection Officer, Kate Canning, Artistic Director, kate@milltheatre.ie
- Employees may not inappropriately access or disclose any personal information by means of the internet, email or any other means.

The company shall reserve the right to monitor and/or record the activities of all users of its ICT systems. This means that any activity, including emails etc. may be intercepted, analysed and read, if necessary. Any such monitoring will be undertaken consistent with data protection requirements.

INFORMATION GATHERED ON OUR WEBSITE

Being familiar with user preferences is an essential element of providing a satisfactory experience for all visitors to our website. The Mill Theatre Management CLG uses Google Analytics to collect information in an anonymous form, including the number of site visits, where visitors 'came from and pages visited.

The Mill Theatre Management CLG's website automatically collects and stores the following information:

- The IP address from which you access our website (an IP address is the number automatically assigned to your computer when you are online)
- The type of browser and operating system used to access our site
- The date and time of your access to our site
- The pages you visit and the internet address of the website from which you accessed our site.

We use this information for the following purposes:

- To make our site as user-friendly as possible
- To gather statistics on the relative interest in different sections of the site.
- We do not, under any circumstances:
 - Link IP addresses to anything that would identify you personally
 - Share the information we track on this site, in any form, with any third party
 - Release personal information about any user

BY USING The Mill Theatre Management CLG'S WEBSITE, VISITORS AGREE TO OUR USE OF COOKIES.

The Mill Theatre Management CLG uses cookies to keep track of visitor interaction with our website which assists us in structuring our content to improve a user's experience. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and the data is removed from our system.

Cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Visitors can choose to accept or decline cookies. Most web browsers automatically accept cookies, but users can modify browser settings to decline cookies. This may prevent a user from taking full advantage of the website.

Using The Mill Theatre Management CLG's website shall be subject to terms and conditions of use. Please consult our Cookies & Privacy Statement on the homepage.

In order to receive The Mill Theatre Management CLG's email newsletter, subscribers are asked for information when they register – name and email address. The Mill Theatre Management CLG's ebulletin is only sent to members and to those who have requested it directly. We use (name of client if relevant) to send emails, automated messages, and targeted campaigns.

If a visitor provides personal information in an email to one of the addresses listed on our website, or by filling out a form with personal information, we only use that information to

respond to the message and to help us process the request. No information so provided will be divulged to any other third party, unless we receive prior authorisation or are requested to do so by law. We take all reasonable precautions to prevent the loss, misuse or alteration of information given to us.

Agents or contractors of The Mill Theatre Management CLG who have access to information given to us in the course of providing services to us are required to keep that information confidential and are not permitted to use it for any purpose other than to carry out the services which they are performing for us.

The Mill Theatre Management CLG's website contains links to other websites we think may be of interest to users. We have no control over the privacy policies or content of these websites.

PROCEDURES AND GUIDELINES

The Mill Theatre Management CLG is fully committed to ensuring personal privacy and compliance with Data Protection law, including the provision of best practice guidelines and procedures in relation to all aspects of the General Data Protection Regulation.

REPORTING A DATA BREACH

We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data subjects and the regulator where we are legally required to do so.

If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact our Data Protection Officer, Kate Canning, Artistic Director, kate@milltheatre.ie

We have a security incident response plan. You should preserve all evidence relating to the potential Personal Data Breach.

REVIEW

This Privacy Policy will be reviewed annually. The next review will be May 2024.