

## **CAMBRIDGE OPEN STUDIOS- GDPR COMPLIANCE & DATA PROTECTION POLICY 2018**

The EU's General Data Protection Regulation (GDPR) came into force on 25<sup>th</sup> May 2018. GDPR updates and replaces the original Data Protection Act. The aim of the regulation is to protect EU citizens' data and privacy. This includes all members of Cambridge Open Studios (COS), affiliated Arts Organisations and advertisers. COS has established and will need to maintain policies and procedures that are compliant with GDPR.

Here are our basic principles and understanding set out by the COS Management Team

1. All members need to know that COS only collects personal information provided voluntarily by themselves. This personal information is on public view on the COS website under ARTISTS PAGES and also JULY OPEN STUDIOS. The information is also printed in our July Guide and available on the COS APP. Without this personal data the work of COS would be impossible. Members have every right not to give this personal information but must understand that without it they will not be able to take full advantage of their membership of Cambridge Open Studios.
2. The COS Management Team has appointed a Data Protection Officer (DPO) who can be contacted via the website to the email address: [DPO@camopenstudios.co.uk](mailto:DPO@camopenstudios.co.uk)
3. The COS Management Team will be vigilant in detecting and investigating any personal data breach. Any **significant** breach will be reported to members concerned and to the Information Commissioners Office within three days of it being discovered.
4. No personal data is shared with third parties other than our mailing provider Mail Chimp.
5. The GDPR Policy will be reviewed by the COS Management Team annually and ratified by the Membership at the Annual General Meeting.

### **General Personal Data Held**

COS holds the following data on members in order to carry out the everyday business of COS.

- a. Name
- b. Address
- c. E-mail Address

### **What is the purpose of the data held?**

Data held on members will only be used for the purposes outlined below.

- a. Managing membership and participation subscriptions – and communicating with members about these
- b. Providing support and communicating with members with regard to their website pages and guide entries.

c. Communicating with members is usually carried out by personal email and Mail Chimp. Any member may unsubscribe from Mail Chimp emails at anytime but need to be aware that they may not then receive important information sent out by the COS team.

### **How General Personal Data on Members is collected**

Personal Data such as email addresses and postal addresses are collected via the website when an artist joins Cambridge Open Studios or renews their membership. Details are stored on the website and also by the Membership Secretary. All members have a choice as to how much personal information they upload to their own Artist page on the COS website. This information is available for public view and may include a telephone number, email address, website address, social media information as well as images of artwork. If preferred, a member may choose to make none of this information public. If a member chooses to participate in the July OS event then other information is required for their guide entry and the Open Studios web pages.

### **Payment details**

All payments by members are taken using PayPal, credit or debit card. Card information is saved by PayPal. If a refund is required we aim to do this via PayPal in a timely manner. Only as a last resort do we contact a member for their bank details. Bank details are then deleted once the transaction has gone through. See also COS 2018 Finance Policy

### **How does the COS Management team use my data?**

Individual members of the COS Management Team will need to hold and use personal data in the form of paper and computer records to fulfil their roles and responsibilities. When the data is no longer relevant, paper records will be given to the Data protection Officer to be shredded and all computer data will be deleted. All computers used by members of the Management Team and COS paid employees will be protected by a secure password.

### **What happens to my data if I do not renew my membership to COS? Do you keep my data?**

At the start of the renewal process each November, all members will be informed that if they choose not to renew then their personal data including their Artist's page will be deleted once the renewal date has passed. Personal data included on the COS App will be deleted once the new version of the App is published the following year. The July Cambridge Open Studios web pages will be removed from the website by the end of September each year.

### **Does COS share personal data with third parties?**

Members' personal data is not shared with any third parties apart from contracted consultants who work for COS and need this information to carry out their work.

### **Can I request the erasure of my personal data?**

If you decide not to renew your COS membership, you are at liberty to delete any data from your Artist page. Once the renewal deadline has passed, any *irrelevant* data that remains will be deleted from the website. All members of the Management Team (see table) will

delete data in a timely manner. Members may email the Data Protection Officer to have this confirmed.

### Do you keep paper records?

Sometimes it is necessary to print out lists and records but they will be given to the DPO for shredding **when no longer relevant**. The only permanent record of members' personal data is included in the annual Open Studios Guide.

### Who should I contact if I have concerns or need to know more?

[DPO@camopenstudios.co.uk](mailto:DPO@camopenstudios.co.uk)

### Who holds personal information, for what purpose and for how long?

Who	What is held or have access to	For what use	How long
Heidi Lichterman Company Secretary	Email addresses of the Management Team	Communications within the Management team	Duration of the post
Leigh Watson Finance Officer	Email addresses of the Management Team	Communications within the Management team	Duration of the post
Marion Curtis Officer with responsibility for membership and communications	Administration rights to the COS website and Mail Chimp  All members email addresses and postal addresses.	To maintain current membership list and contact details. Support members with enquiries.	Duration of the post
Kay Dodsworth Clerk to the Management Team	Email addresses of the Management Team	Communications within the Management team	Duration of the post
Anthony Hopkinson Book keeper	Administration rights to PayPal. See also Finance Policy.	To manage and track all payments.	Duration of the post
Clare Gilmour Website Manager	Administration rights to the COS website, Pay Pal and Mail Chimp  All members email addresses and postal addresses.	Communications within the Management team and with members.	Duration of the post
David Hatton Guide Editor	Admin rights to the website where personal email address and telephone numbers	Communications within the Management team and with members.	All spreadsheets are deleted when no longer relevant and definitely deleted at the end of July each

	are available.		year. All paper proofs are kept for one year and then destroyed. All email correspondence and images are kept for one year and then deleted.
Sonia Villiers Publicity Group	Email addresses of the Management Team	Communications within the Management team	Duration of the post
Peter Harrison Publicity Group	Email addresses of members who borrow the PVC village banners. Email address of Galleries and Affiliated Arts organisation who borrow banners.  Email addresses of the Management Team	To contact all those who enquire to borrow a PVC village banner.	Banner loan data kept and used between March and October each year. Otherwise for the duration of the post.
Rosemary Dodgson Publicity Group	Email addresses of members who volunteer to help at publicity events.  Email addresses of the Management Team	To contact any member who volunteers to help at publicity events.	Duration of the post
Sarah Dodkin Rush Gabriella de Valle Sarah Lee Distribution Group	All postal and email addresses of each year's participants.  Email addresses of the Management Team	To assist is arranging the distribution of the guide around the county	Duration of the post
Dilek Özgit Website Oversight	Email addresses of the Management Team	To contact individual artists with regards to the content of their Artist page.	Duration of the post
Jocelyne Dudding Guide Production	Email addresses of the Management Team	Communications within the Management team and members as necessary.	Duration of the post
Esther Yasmin	Email addresses of	Communications	Duration of the post

Guide Production	the Management Team and publicly available details of members.	within the Management team and members as necessary.	
Annie Brown Social Events and AGM Organiser	Email addresses of the Management Team plus those members who have responded to invitations via Mail Chimp to meetings and social events.	Communications within the Management team and members as necessary.	Duration of the post
Spirus Marketing	Publicly available contact details for members.	Communication with members concerning publicity and promotion matters.	All information is stored on Dropbox and deleted at the end of the July Open Studios.