



## Privacy & Data Protection Policy

**Please read this policy carefully to understand how we collect, use and store your personal data.**

### Introduction

The Cambridge Drawing Society is a not for profit membership organisation created to give a practical and affordable opportunity for local artists, amateur and professional, to exhibit their original works in Cambridge. The Society takes your privacy very seriously and is committed to protecting your personal information.

The Society must be one of the oldest in the UK, having been founded in 1882. Despite its name, it does not just show drawings, but a wide range of paintings, mixed media items, batik, sculpture and limited-edition prints (not photographs, digital prints or domestic pottery). Membership is limited to artists living within a thirty-mile radius of Great St Mary's, Cambridge.

Candidates have the opportunity to join the Society during the annual Spring exhibition each April. The application form and guidelines for the Spring exhibition are made available each January. The selection committee is presided over by the President and consists of eight ordinary members of the Society who have been members for a minimum of five years and have been regular exhibitors.

This Privacy & Data Protection Policy explains how we, the Cambridge Drawing Society, will collect, store, process and protect the information you give us – this means any information that identifies or could identify you. It outlines the type of data that we hold and how we use this data to administer the exhibitions and events run by the Society.

The Cambridge Drawing Society is a 'data controller' for the purposes of the Data Protection Act 1998 and from May 25 2018, the EU General Data Protection Regulations (GDPR) 2016/679 ('Data Protection Law'). This means that we are responsible for and control the processing of your personal information.

For further information or if you have any concerns regarding our policy, please write to:

The Honorary Secretary  
Cambridge Drawing Society  
315, High Street  
Cottenham  
Cambs  
CB24 8TX  
Email [secretary@cambridgedrawingsociety.org](mailto:secretary@cambridgedrawingsociety.org)

## This policy includes:

- How we collect your information
- What personal information we collect
- How we may use your personal information
- How we keep your information safe
- How we might share your information
- How we keep your information up to date
- How long we keep your information
- Our legal basis for keeping and processing your information
- Your rights under GDPR
- Changes to this policy

## How will we collect your information?

We want to make sure that you receive the communications that are most relevant to you, be it through visiting our website, receiving emails, or postal correspondence. The Cambridge Drawing Society may collect information in the following ways:

- **When you give us information directly:** You may provide your details to us when you join, renew your membership, join or renew your subscription as a Friend of the Society, purchase a work through one of our annual exhibitions or provide your email address when completing one of Favourite Works voting slips at an exhibition run by the Society.
- **When you give us information indirectly:** There are no circumstances where we receive personal details indirectly without your permission.
- **When you have given other organisations permission to share it:** There are no circumstances where we receive personal details from other organisations without your permission.
- **Social media:** Depending on your settings or the privacy policies for social media and messaging services like Facebook and Twitter, you might give us permission to access information from those accounts or services.

- **When your information is available from other public sources:** We will not collect and hold your details from other sources that are in the public domain.

## What personal information will we collect?

The type and quantity of information we collect and how we use it depends on why you are providing it.

If you are a member of the Society:

- Your name
- Your contact details (full address, email address and phone number)
- The year you joined the Society

If you are a Friend of the Society:

- Your name
- Your contact details (full address, email address and phone number)
- The year you joined the Society

If you are a member of the public visiting a Society exhibition and you purchase a work:

- Your name
- Your contact details (full address, email address and phone number)
- The year you purchased the work(s)

If you are a member of the public visiting an exhibition and voting for your favourite work:

- Your name
- Your contact details (email address only)

## How will we use your personal information?

We will use your personal information in a number of ways, including for the following purposes:

### Members

- To provide you with information required to participate in the Society's exhibitions
- To update you about Society news and events
- To administer your membership or events subscriptions
- To maintain our records
- To help us improve our services, events or information-offering
- To analyse and improve the operation of our website

### Friends of the Society:

- To update you about Society news and events
- To administer your annual subscriptions
- To maintain our records
- To help us improve our services, events or information-offering

### Members of the public who have purchased work, or completed Favourite Work voting Slips:

- To communicate details of upcoming exhibitions
- To monitor purchaser trends to aid publicity and exhibitions strategies in the future

You can opt out of your data being used for any of the above anytime in the future by emailing:

[secretary@cambridgedrawingsociety.org](mailto:secretary@cambridgedrawingsociety.org)

## Use of Facebook

We do not pass on members' personal data to Facebook. If you have an account with Facebook and follow the Cambridge Drawing Society, the personal information Facebook holds on you will depend on your settings. **The Cambridge Drawing Society does not share any personal information with Facebook or any other social media platform.**

For more information please see:

<https://www.facebook.com/business/help/744354708981227>

and Facebook's Data Policy at: <https://en-gb.facebook.com/policy.php>.

## Our use of cookies

'Cookies' are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. Essentially, a cookie takes the form of a small text file deposited on your computer's hard drive. **The Cambridge Drawing Society does not currently use cookies on its website.**

## **How we keep your data safe?**

We place great importance on the security of your personal information and will always take necessary precautions to protect it.

We ensure that there are appropriate technical, physical and organisational controls in place to protect your personal information, both on and off-line, from improper access, use, alteration, destruction or loss. For example, we use password protection on the Society's database and carry out regular security reviews. No personal data is stored or otherwise available through our website, except for information provided by the Society's members and stored in their Members Listings.

Except in specific circumstances (detailed in the next section below) we will ensure that only authorised personnel (i.e. Cambridge Drawing Society Committee members) have access to your information and that they are appropriately trained to manage your data.

Despite precautions, no data transmission over the internet can be guaranteed to be 100% secure. While we strive to protect your personal information, we cannot always guarantee the security of any information as you disclose it to us online, and you must understand that you do so at your own risk.

Our website may contain links to other sites. While we aim to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites or organisations. Please be aware that advertisers or web sites that may have links on our site may collect personally identifiable information about you. This Privacy & Data Protection Policy does not cover the information practices of those websites or advertisers.

### What happens if there is a data breach?

In the event that others may have hacked your data or otherwise altered, obtained or deleted your personal information held by the Cambridge Drawing Society without authorisation, the Honorary Secretary will inform you of the nature of the breach as soon as possible and take whatever remedial action is necessary to either seek to recover the information or prevent any reoccurrence of the breach. Advice from external experts/IT support may be sought in resolving the incident promptly.

If appropriate, we will also notify the Information Commissioner's Office (ICO), wherever possible within 24 hours of the discovery of the breach and co-operate fully with any subsequent investigation. Guidance on how and when the ICO should be notified can be found at: [https://ico.org.uk/media1536/breach\\_reporting.pdf](https://ico.org.uk/media1536/breach_reporting.pdf)

### **Will we ever share your personal data?**

The Cambridge Drawing Society will never share your personal information with other organisations, unless required to by the authorities in accordance with relevant legislation and potential law enforcement requirements.

### **How we keep your information up to date?**

We will also make our best endeavours to keep your records up to date; primarily through our interaction with you at the time of subscription renewal and when you enquire about or register to attend an event. However, we would be grateful if you could let us know of any changes to your contact details at the earliest opportunity.

### **How long we keep your information for?**

We will hold your personal information on our systems only for as long as is necessary, which in terms of members and Friends of the Society this would normally be until you end your subscription. If we do not hear from you when a renewal is due, we will retain your information for a further 6 months from the scheduled renewal date to accommodate a late renewal request. If we have not heard from you by a date of 6 months from the renewal falling due, your data will be deleted. Should you tell us when your renewal becomes due that you do not wish to continue your membership, we will delete your details at the point that your membership expires. If at any time you wish to cancel your membership, we will delete your information within one month of such a request.

Should you contribute material to us, for example through user generated content or in response to a particular campaign on Facebook, we will generally only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted, unless otherwise stated at the point of generation.

Each year at the time of annual member renewals in January, a Data Protection Audit will be carried out by the Honorary Secretary to ensure that all private information that is no longer required for the Society to undertake its day to day operations and/or individual member records that we have keep for six months beyond the last renewal date, are deleted in accordance with this Policy. A report on the Data Protection Audit will be presented annually to the next scheduled committee meeting of the Cambridge Drawing Society.

## **Our legal basis for processing your information**

Our legal basis for processing your information generally rests on the consent given by you for us to do so at the point that you join or renew, or because we need to use it in order to fulfil our obligations to you as a member of the Society.

We will process your information in accordance with that consent, i.e. in the interests of your membership of the Society, to inform you of the Society's activities, news and of forthcoming events that may be of interest to you. You are entitled to withdraw that consent at any time.

However, there are other lawful reasons that allow us to process your personal information, including 'legitimate interests'. This means that the reason we are processing information is because there is a legitimate interest for the Cambridge Drawing Society in processing that information. Some examples of where we have a legitimate interest in processing your information may be where we may use your information for data analytics to improve our services to members, or where the Cambridge Drawing Society may legally be obliged to share data in accordance with relevant legislation and potential law enforcement requirements.

## **Your rights**

You retain control of your personal information and how we use it. You have various rights in respect of the information we hold about you, which are set out in detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at: [secretary@cambridgedrawingsociety.org](mailto:secretary@cambridgedrawingsociety.org)

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it and how long we keep it for. You can make a request for access free of charge. If you wish to make an access request, please do so in writing using the Subject Access Request Form provided on our website.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where you believe we have no lawful basis for holding it.

- **Portability:** You can ask us to provide you or a third party with some of the personal information we hold about you.
- **Object:** You can object to our processing of your personal information where we are relying on a legitimate interest and where you have a particular reason to object to processing on this ground. You also have the right to object to the processing of your personal information for direct marketing purposes, for example, for events. If you wish to object, please notify us as describes above, providing details of your objection.
- **Consent:** If you have given us your consent to collect and process your personal information (e.g. when you join the Society you have the right to withdraw that consent at any time.
- **Automated decision making and profiling:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decision making unless you have given us your specific consent, it is necessary for a contract between you and the Society or is otherwise permitted by law. You also have the right to challenge any decisions made about you. **The Cambridge Drawing Society does not currently carry out or facilitate automated decision making.**

Please note that some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

For more information on these rights please read the relevant guidance issued by the ICO at <https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/individuals-rights/> If you would like to make a complaint about how we process your personal data, please contact the Honorary Secretary: [secretary@cambridgedrawingsociety.org](mailto:secretary@cambridgedrawingsociety.org)

If you make a complaint and are not happy with how your complaint has been dealt with, you can contact the Information Commissioners Office directly. Alternatively, you are entitled to make a complaint to the Information Commissioner's Office without first referring your complaint to us: <http://ico.org.uk/> For further information please see the Information Commissioner's guidance: <https://ico.org.uk/concerns/>

## Changes to this Privacy & Data Protection Policy

This policy may change from time to time. The Policy was last updated in May 2018 to ensure its compliance with GDPR. If we make any significant changes to this policy, we will publicise these changes clearly on our website or contact you directly with more information.

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