

THE FIRKIN CRANE LTD PRIVACY POLICY

#### Who we are

Name: Firkin Crane

Address: John Redmond Street, Cork

Contact: 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
  - o Firkin Crane website
  - o 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
  - Classes 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
  - o 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.

### 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
- o 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 supress 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)
    - o 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
    - o 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: <a href="https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm">https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm</a>

# Automated decision making, including profiling

Firkin Crane does not use any automated decision making or profiling.

Ends