

## **Privacy Policy**

### **Introduction**

Bristol Folk House is committed to protecting your personal information when you use our services. This Privacy Policy relates to us using any personal information that we collect from you via the following services:

- any personal information that you provide by phone, email, in letters and other correspondence, and in person.
- any Bristol Folk House website that links to this Privacy Policy
- social media or official Bristol Folk House content on other websites

Bristol Folk House is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use it in line with all applicable laws concerning the protection of personal information.

Please note, the Bristol Folk House websites contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and also use cookies. They govern the use of personal information you submit when visiting these websites, which may also be collected via cookies. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such sites is at your own risk.

### **About the Bristol Folk House**

The Bristol Folk House is an adult education centre providing a variety of part-time day and evening courses and workshops for over 18's. The Folk House provides a welcoming environment in which to explore your creativity and learn new skills. Live music and festivals happen throughout the year, as well as markets, events and exhibitions.

The Bristol Folk House is part of a charity and we receive no funding from the government, the city council or any other institution and our income is wholly derived from course fees, venue hire, members and fundraising events. The centre began in the 1870's with the aim of supporting access to education in the community. The first programme of activities was produced for the academic year in 1920-1921.

During this policy and online when saying “we”, “our” or “Bristol Folk House”, we’re referring to Bristol Folk House Co-operative Ltd

Registered office: 571 Fishponds Road, Fishponds, Bristol, BS16 3AF

Registered company number: 03404836

The Data Controller is Bristol Folk House Co-operative Ltd and our registration number in the Data Protection Register with the Information Commissioner’s office is ZA347985.

### **Information collected by the Bristol Folk House**

We may collect your personal information when you: participate in, access or sign up to any of our services, activities – such as mailing lists, competitions, phone or email us, membership, donate money to Bristol Folk House, reserve a place at an event, enrol one of our courses or workshops.

Please note that we may need additional, sometimes sensitive, personal information from you such as benefit proof and medical notes for refunds. The processing of special categories of personal data is only permitted in certain situations and we will explain further why we're collecting the information and how we'll use it and always obtain your explicit consent to process specific categories of personal data.

What types of personal data do we collect?

- Name
- Contact details including email, phone number and postcode (plus full address for members)
- Your communication preferences
- Course preferences
- Prior education level (if relevant for a course level)
- Date of birth (where relevant over 18 or over 65)
- State benefits (where relevant)
- Disability/learning difficulty information, and support information where relevant

### **How will Bristol Folk House use the personal information it collects about me?**

By providing Bristol Folk House with your personal information it will be stored, used and shared by us for any of the following purposes:

Offline

- To register you on to one of our courses or events.
- To provide you with information about the course; allow the tutors to identify you, track your course bookings.
- To provide you with invitations and updates to relevant events (members only).
- To enhance, modify, personalise or otherwise improve our services/communications for the benefit of our students/customers.
- To provide postal communications which we think will be of interest to you (members only).

Online

- To better understand how people, interact with our websites.
- To determine the effectiveness of promotional campaigns and advertising.
- For the direct marketing of Bristol Folk House products and services.
- To identify and prevent fraud.
- To enhance the security of our network and information systems.

If you choose to join our mailing list, will be asked for consent to send you marketing communications about products and services. You'll be able to opt out of these communications at any point during registration and unsubscribe at any time from the link option at the bottom of each email we send you.

We will ensure we always keep your rights at the forefront when processing data. You have the right to object to this processing if you wish however, please bear in mind that if you object, this may affect our ability to carry out the tasks, mentioned above, for your benefit.

If we were to use your personal information for any other means will would inform you in advance.

### **Retaining your personal data**

We will hold and process your personal information on our systems only for the purpose for which the data was originally collected, or as long as is set out in any relevant contract you hold with Bristol Folk House. If you enrol on a course with Bristol Folk House, we'll retain your personal information for 7 years in line with our responsibilities to record and report on this information for government bodies.

If in the future we intend to process your personal data for a purpose other than that which we collected it for, we will provide you with information on that purpose.

### **Legal basis for processing your information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we'll make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not.

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we'll make clear to you at the relevant time what those legitimate interests are.

If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

### **Marketing preferences**

We offer regular emails to let you know about our courses, events and news. You will only receive these emails if you consent to doing so.

You can update your communication preferences and stop receiving any future emails at any time by following the links located at the bottom of our emails.

If you believe you have received unwanted, unsolicited emails sent by the Bristol Folk House, please forward a copy of that email with your comments to [admin@bristolfolkhouse.co.uk](mailto:admin@bristolfolkhouse.co.uk) for review.

If you enrolled on a course, on our mailing list or attending an event we may invite you to take part in surveys about our services or issues affecting Bristol Folk House.

For Members only – We will be contact you via post and via email to let you know about our courses, events and news. You can opt out of this when becoming a member.

Bristol Folk House may contact you by phone or email if you have shown interest in a course or event (e.g. waiting list). We will only contact you this way if have given us consent.

### **What are cookies?**

#### **What Are Cookies**

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of this sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies...

#### **How We Use Cookies**

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases, there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

#### **Disabling Cookies**

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

#### **The Cookies We Set**

This site offers a newsletter/ email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users. When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

### **Third Party Cookies**

In some special cases, we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

**For more information on Google Analytics cookies, see the official Google Analytics page.**

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Twitter, Facebook, Instagram, Google+, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### **More Information**

Hopefully, that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site. However, if you are still looking for more information then you can contact us through one of our preferred contact methods.

### **Sharing of my personal information**

Bristol Folk House does not share your personal data with anyone else unless stated otherwise.

Bristol Folk House does share course statistics and archive material to the Bristol Folk House Charity, but this does not contain any personal data.

Bristol Folk House sometimes uses third parties to process and store your information on our behalf, for example to provide services (mailing list, feedback) or analysis. We require these third parties to comply strictly with your instructions and that they don't use your personal information for their own business purposes, unless you have explicitly consented to them using your personal information in this way.

Although most of the information we store, and process stays within the UK, some data may be transferred to other countries. Transfers to countries within the EU are permitted because every EU country is subject to the requirements under GDPR.

### **Protection of my personal data**

We have implemented the appropriate safeguards to ensure your data is protected. Examples of how we protect your personal data include the following:

- Restricted access rights to I.T. systems, with processes in place to grant and revoke these rights;
- Firewalls and virus protection in place which are monitored and updated on a systematic basis;
- Physical security measures such as viewed door access and surveillance monitoring systems;
- Use of secure off-site data centre with a high level of physical security and back-up procedures in place to protect data;
- Business continuity and disaster recovery procedures in place.

### **What are my rights?**

You have following rights:

#### **Right of access:**

You have the right to request a copy of the personal information we hold about you, except where releasing that information would breach another person's privacy or where an exemption applies.

You may request in writing that Bristol Folk House disclose details of data which it holds about you and the purpose for which such data is held. A 'Subject Access Request Form' will be supplied upon request. We'll need your passport or driver's licence for proof of identity.

If we do hold information about you, we'll:

- give you a description of the categories of personal data;
- tell you why we are holding/processing it;
- tell you who it has and or might be disclosed to; and
- let you have a copy of the information in an intelligible form.

If we hold incorrect information about you, you can ask us to correct any mistakes by contacting the Data Protection Officer. We'll use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

Please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, Bristol Folk House, 40a Park Street, Bristol, BS1 5JG, or email: [admin@bristolfolkhouse.co.uk](mailto:admin@bristolfolkhouse.co.uk)

#### **Right of rectification:**

You have the right to update or amend the information we hold about you if it is incorrect.

**Right of erasure:**

Ask us to remove your personal information from our records. If you request that your data be erased without undue delay, we'll securely dispose of it if one of the following grounds applies:

- the data is no longer necessary for the purposes it was collected;
- you withdraw your consent and there is no other legal ground for processing the data;
- you object to the processing of data for direct marketing purposes; and
- we have unlawfully processed your personal data.

**Right to restrict processing:**

You have the right to stop or limit processing of your personal data. When processing is stopped, we're permitted to store the personal data but not to further process it.

If you request that your data processing be processed in limited circumstances, we'll store the information we still need to process your data within these limited parameters and a note detailing the request to limit processing to ensure we don't contact you again in the future.

**Right to data portability:**

You have the right to obtain a copy of your personal data provided that the processing is based on your consent and it is carried out by automated means.

You also have the right to ask us to transmit the data to another controller.

**Right to withdraw consent:**

You have a right to object by withdrawing your consent at any time, although this will not affect the lawfulness of any processing carried out before the withdrawal. Nor will it affect any processing undertaken on other lawful grounds.

If you want to request a copy of your personal data then please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, Bristol Folk House, 40a Park Street, Bristol, BS1 5JG, or email: [admin@bristolfolkhouse.co.uk](mailto:admin@bristolfolkhouse.co.uk)

**Right to make a complaint to the supervisory authority:**

You have the right to make a complaint to the Information Commissioner's Office (ICO):

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Tel: +44 (0)303 123 1113 (local rate)

Web: [ico.org.uk](http://ico.org.uk)

### **Offensive or inappropriate content**

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to Bristol Folk House websites or social media channels, or otherwise engage in any disruptive behaviour on any Bristol Folk House service, we may remove such content.

Where Bristol Folk House reasonably believes that you are in breach of any applicable laws, we may disclose your personal information to relevant third parties, including law enforcement agencies or your internet provider. Bristol Folk House would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

### **Changes to the Bristol Folk House privacy policy**

This Privacy Policy will be updated so please review every time you submit personal information to Bristol Folk House. The date of the most recent revisions will appear at the bottom of this page. If you don't agree to these changes, please refrain from using Bristol Folk House websites to submit personal information to us.

If material changes are made to the Privacy Policy, for instance affecting how we'd like to use your personal information, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

We will review this Privacy Policy after the Data Protection Bill has been finalised and the ICO has provided interpretation of the GDPR requirements.

### **Contacting Bristol Folk House**

If you have any questions or comments about this Privacy Policy, please contact:

Data Protection Officer, Bristol Folk House, 40a Park Street, Bristol, BS1 5JG

**Email: [admin@bristolfolkhouse.co.uk](mailto:admin@bristolfolkhouse.co.uk)**

Last updated: 18.06.18