



# PRIVACY POLICY

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## LEGAL STATEMENT

Dance Ireland is the trading name of the Association of Professional Dancers in Ireland Company Limited by Guarantee; company registration no: 189346; CHY no: 16193.

## PRIVACY COMMITMENT

We are aware that as a user you care about the security and privacy of your information. Any personal information that you volunteer to Dance Ireland, either as a member, DanceHouse 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.

We are also committed to ensuring the privacy of personal information of staff, board and all contract providers and personnel.

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.' EU Data Protection Directive (DPD); commonly known as Data Protection is being replaced with the General Data Protection Regulation (GDPR), effective from May 2018, which 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.

Dance Ireland 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 Dance Ireland. We are committed to safeguarding the privacy rights of all our officers, employees, members, service users, contractors, and donors.

Dance Ireland is committed to protecting the privacy of all individuals in relation to the processing of persona data that we may collect, access, and use and/or disclose.

Any personal information that is volunteered to or sought by Dance Ireland 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**

Dance Ireland 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 than 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.

Dance Ireland's Data Protection Officer is Eve Lalor, General Manager and is responsible for co-ordinating support, assistance, advice, and training within the organisation to ensure that we comply with relevant legislation and regulation. Eve can be contacted by telephone on 01 855 8800 or by email to [eve.lalor@danceireland.ie](mailto:eve.lalor@danceireland.ie).

## **DATA MANAGEMENT**

Dance Ireland collects, processes and maintains data for a number of purposes:

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 Dance Ireland, as an eligible charity under the Charitable Donations Scheme.
4. To process applications for funding and commissions managed by Dance Ireland
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 purpose of administration and management, and to comply with employment and tax law and regulation, information regarding employee terms and conditions and other HR records is 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 the Chief Executive, and as necessary the General 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 an organisation is acting on behalf of Dance Ireland with its consent. Internally, information maybe 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 Dance Ireland'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.

- **Members and subscribers**

Member records contain information needed to service subscriptions – contact name, address, phone and email addresses. In addition, for professional members we require CVs and we require all members to fill and sign a membership form (electronically and/or manually). Information is sought and provided voluntarily and is collected and processed manually and in digital format. Data is held on computer and in manual files. Relevant records are maintained and kept up to date by the responsible officer. Access to subscriber data is restricted access. Internally, information may be made available to other staff, as circumstances dictate, for example communications purposes.

Subscribers to mailing lists (ebulletin) 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. Dance Ireland 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 Dance Ireland, with its consent.

Individuals and organisations making applications to join Dance Ireland 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 the application form:

*Please note, unless you indicate otherwise, information you provide will be maintained in a database maintained by Dance Ireland to inform you about membership services and programme activities. This includes sharing relevant information via our ebulletin and by email to assist our staff connect, network and organise events to support your membership. I agree to allow Dance Ireland to store my contact details for these specific purposes. Yes/No.*

## **OPERATION OF THE CHARITABLE DONATIONS SCHEME OF TAX RELIEF**

Dance Ireland 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.

Dance Ireland 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 Dance Ireland 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**

Dance Ireland 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, Dance Ireland 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 Dance Ireland 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 Dance Ireland 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 Dance Ireland to store my contact details for these specific purposes. Yes/No.*

## **RESEARCH SURVEYS AND POLICY CONSULTATIONS**

From time to time Dance Ireland conducts membership and sectoral 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 Dance Ireland 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.
- 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. Dance Ireland uses Google Analytics to collect information in an anonymous form, including the number of site visits, where visitors' came from and pages visited.

Dance Ireland'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 DANCE IRELAND'S WEBSITE, VISITORS AGREE TO OUR USE OF COOKIES.**

Dance Ireland 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 Dance Ireland's website shall be subject to terms and conditions of use. Please consult our Cookies & Privacy Statement on the homepage.

In order to receive Dance Ireland's email newsletter, subscribers are asked for information when they register – name and email address. Dance Ireland's ebulletin is only sent to members and to those who have requested it directly. We use Mailchimp to send emails, automated messages, and targeted campaigns. Mailchimp's policy on information collection and use is published online: <https://mailchimp.com/about>.

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 Dance Ireland 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.

Dance Ireland'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**

Dance Ireland 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, Eve Lalor, General Manager on 01 855 8800 or email [eve.lalor@danceireland.ie](mailto:eve.lalor@danceireland.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 2019.

**Dance Ireland Board of Directors:** John Malone (Chairperson) | Dr. Orfhlaith Ní Bhriain (Deputy Chairperson) | Joseph O'Hanlon (Secretary) Aoife Courtney | Mihaela Griveva | Laura Murphy | Laura Macken Posavitz | Maria Nilsson Waller

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