

Cranleigh Arts Centre Data Protection Policy

Introduction

Cranleigh Arts Centre ("Cranleigh Arts") is committed to protecting personal data and respecting the privacy of all those who engage with us. In order to operate effectively, we need to collect and use certain information about people with whom we work. This may include members of the public, audiences, customers, current, past and prospective employees, volunteers, trustees, artists, contractors and suppliers. We use personal data to administer events, manage staff and volunteers, communicate with audiences, and to meet monitoring and reporting requirements linked to public funding. In addition, we may be required by law to collect and use information to comply with the requirements of central government or other regulatory bodies.

Cranleigh Arts is committed to ensuring that personal data is handled properly, securely and transparently, and in compliance with applicable data protection law. This policy explains how we do this and the rights of individuals whose personal data we process.

This policy is written in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Cranleigh Arts is registered with the Information Commissioner's Office (ICO) as a data controller. ICO Registration Number: Z5427214.

Definitions

For the purposes of this policy:

- Personal data means any information relating to an identified or identifiable living individual. This includes, but is not limited to, names, addresses, email addresses, telephone numbers, photographs, CCTV images, online identifiers, and employment records.
- Special category personal data includes information about racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, health data, sex life or sexual orientation, and genetic or biometric data.
- Criminal offence data includes data relating to criminal convictions or offences.

Data Protection Principles

Cranleigh Arts will comply with the seven data protection principles set out in the UK GDPR. Personal data shall be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes
- Adequate, relevant and limited to what is necessary
- Accurate and, where necessary, kept up to date
- Kept in a form which permits identification of individuals for no longer than necessary
- Processed securely, protecting against unauthorised or unlawful processing, accidental loss, destruction or damage
- Accountable, meaning we take responsibility for compliance and can demonstrate it

Lawful Basis for Processing

Cranleigh Arts will only process personal data where we have a lawful basis to do so under Article 6 of the UK GDPR. These include:

- The individual has given consent
- Processing is necessary for the performance of a contract
- Processing is necessary for compliance with a legal obligation
- Processing is necessary to protect vital interests
- Processing is necessary for the performance of a task in the public interest
- Processing is necessary for our legitimate interests, provided those interests do not override the rights and freedoms of the individual

The lawful basis used will depend on the purpose for which the data is processed.

Special Category and Criminal Offence Data

Special category personal data and criminal offence data will only be processed where:

- A lawful basis under Article 6 exists and
- An additional condition under Articles 9 or 10 of the UK GDPR is met

Cranleigh Arts will apply additional security and confidentiality safeguards when handling this type of data.

Individuals' Rights

Under the UK GDPR, individuals have the following rights in relation to their personal data:

- The right to be informed about how their data is used
- The right of access to their personal data
- The right to rectification of inaccurate or incomplete data
- The right to erasure (in certain circumstances)
- The right to restrict processing
- The right to data portability
- The right to object to processing
- Rights relating to automated decision-making and profiling

Requests to exercise these rights should be made in writing. Cranleigh Arts will respond within one month, unless an extension is permitted by law.

Data Security

Cranleigh Arts takes appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include access controls, secure storage, staff training, and regular reviews of data handling processes.

All staff, volunteers and trustees have a responsibility to ensure that personal data is handled securely and in accordance with this policy.

Data Breaches

A personal data breach is a security incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

Any suspected data breach must be reported immediately to the Operations Director who is responsible for data protection within Cranleigh Arts. Where required by law, breaches will be reported to the Information Commissioner's Office within 72 hours and to affected individuals without undue delay.

Data Retention

Personal data will be kept only for as long as necessary for the purposes for which it was collected, or as required by law. Cranleigh Arts will ensure that data is securely deleted or destroyed once it is no longer required.

Disclosure and Sharing of Data

Cranleigh Arts may disclose personal data where required to do so by law, including in response to a court order or other legal requirement. Wherever possible and lawful, we will notify individuals before making such disclosures.

Personal data may be shared with trusted third-party service providers where necessary for our operations, subject to appropriate contractual safeguards.

No Commercial Use of Data

Cranleigh Arts will not sell, rent, distribute or otherwise make personal data commercially available to any third party without the individual's consent, except where required by law.

Governance and Responsibilities

Cranleigh Arts will ensure that:

- Everyone managing or handling personal data understands their responsibilities
- A named individual has responsibility for overseeing data protection compliance
- Staff and volunteers receive appropriate guidance and training
- Data protection practices are regularly reviewed and improved
- Any disclosure of personal data complies with approved procedures

Failure to comply with this policy may result in disciplinary action.

Policy Review

This policy will be reviewed annually, or sooner if required due to legislative or organisational changes.

Date Adopted: June 2024

Reviewed: April 2026

Next Review Date: April 2027

Signed: A handwritten signature in black ink, appearing to read "B. F. H. H. H.", written over a horizontal line.

Chair of Directors/Trustees

Date: 23rd April 2026