

Data Protection Policy

1. POLICY INFORMATION

1.1 Our Organisation

Edinburgh International Science Festival (EISF) is a registered charity (SC 003790), based at Harbourside House, 110 Commercial Street, Edinburgh EH6 6NF. We deliver the annual Science Festival in addition to a range of educational activities and one-off events.

EISF is the **'data controller'** under the terms of the legislation. This means it is ultimately responsible for controlling the use and processing of the personal data. The Data Protection Act 1998 requires every data controller who is processing personal information to register with the Information Commissioner's Office. Our registration number as a Data Controller is Z8473068

1.2 Scope of Policy

Edinburgh International Science Festival (EISF) is committed to a policy of protecting the rights and privacy of individuals, including customers, staff and others, in accordance with the General Data Protection Act (GDPR) May 2018. The new regulatory environment demands higher transparency and accountability about the management and use of personal data.

EISF has appointed a Data Protection Officer (DPO), currently the Chief Operating Officer, to take overall responsibility for how personal data is processed, held and used.

The Data Protection Officer
Edinburgh International Science Festival
Harbourside House
110 Commercial Street
Edinburgh EH6 6NG

Email: data@scifest.co.uk

You may request that we correct or delete your personal information at any time by contacting data@scifest.co.uk

Whenever a data controller (EISF) uses a data processor (a third party who processes personal data on behalf of the controller), that relationship requires a written contract or mutually agreed terms and conditions to ensure that both parties understand their obligations, responsibilities and liabilities to comply with the GDPR.

EISF works with a small number of data processors in order to sell tickets, undertake marketing, manage its fundraising, curate events and support its IT operation. These include Red61 (box office services); Mailchimp (emails); Forth Tech (IT servers and support), Eventbrite (for special events), We Are Everyone (website developers), Wufoo (for communicating with content providers), Wordpress (for communication with content providers) PR agencies (for public relations purposes).

EISF works with data processors who provide 'sufficient guarantees' that the requirements of the GDPR will be met and the rights of data subjects protected. These terms are designed to ensure that

processing carried out by a processor meets all the requirements of the GDPR (not just those related to keeping personal data secure).

These agreements cover items such as the subject matter and duration of the processing; the nature and purpose of the processing; the type of personal data and categories of data subject and the obligations and rights of the controller

1.3 Policy Operational Date

The policy is in effect from 25.5.18. It is reviewed on an on-going basis but formally reviewed every 12 months. The Policy has been prepared by the Chief Operating Officer who is EISF's Data Protection Officer. The Policy is reviewed and approved by EISF's Board of trustees.

2. INTRODUCTION

2.1 Purpose of the Policy

EISF has a Data Protection Policy because it is committed to protecting the privacy of its data subjects. EISF needs to process certain information about its customers, suppliers and other users with whom it has a relationship for various purposes including but not limited to the administration of events, workshops and activities.

2.2 Types of Data

We use the information we collect about you to provide a personalised service and it may include your name and title; postal address, Telephone number, Email address, contact preferences, details of correspondence sent to you or received from you, information acquired via Cookies & Analytics and headshots.

For customers who purchase tickets, as well as the above information, the types of data we collect about you to provide a personalised service include Ticketing history, Billing information, Donation history (including Gift Aid status).

EISF collects information in the following ways:

- When you give it to us **DIRECTLY**

Edinburgh International Science Festival collects personal data from you when you create an account with us, register for an e-newsletter, buy tickets for our events, make a donation/become a supporter - as well as from any email correspondence that you might send us.

When you book tickets, we need to collect information about you to process the transaction and fulfil your order. This information may include, but is not limited to, details such as your name, your address and your credit card details. We use the information to process any transactions you undertake with us and for internal administration and analysis.

- When you give permission to OTHER ORGANISATIONS to share

Our website uses cookies - small text files that are placed on your computer by websites that you visit – in order to analyse visits, provide social media features and personalise online content.

There are two types of cookies, session and analytical. Session cookies provide our online booking service, allowing us to link you to the website if you are logged in. These are created temporarily and once you log-out and close the browser – ending the session – the cookies are deleted. You can choose whether or not to allow cookies using the privacy settings of your browser. However, session cookies must be enabled in order for our online service to process your bookings.

We do use tools to monitor the effectiveness of our communications, including website and email tracking. Analytical cookies allow us to record page visits and sources so that we can measure the performance of our site. We use a service called Google Analytics and more details can be found at www.google.com/intl/en/policies/privacy.

We also analyse when an e-newsletter is opened and what links contained in that email are clicked. All of this data is used in an aggregated and anonymised form to monitor, for example, opening rates (as a percentage) or the number of visitors to the website.

When we ask you to provide your personal data, we will let you know why we are asking and how your data will be used by referring you to our Privacy Policy. Personal information may include **but is not limited to** your name, title, postal address, email address and a contact phone number. We only collect the personal information that is necessary to meet our business needs and to provide you with the services you have requested.

2.3 Policy Statement

Legislation places a responsibility on every data controller to process any personal data in accordance with the following principles:

1. Personal info must be fairly and lawfully processed and transparent
2. Personal info must be processed for limited purposes – specific and explicit purposes
3. Personal info must be adequate, relevant and not excessive
4. Personal info must be accurate and up to date
5. Personal info must be kept for no longer than is necessary
6. Personal info must be processed in line with the data subject's rights
7. Personal info must be secure
8. Personal info must not be transferred to other countries without adequate protection

We collect personal data from you where there is a valid legal basis for doing so, such as to fulfil a contract with you or because you have given your consent. If you are purchasing tickets, this information is used to process the transaction and provide you with goods and services. It also allows us to notify you in case of cancellation, postponement or relocation of any events/shows/workshops.

We rely on your consent for our marketing communications. If you wish to hear from us about our Festival and Education programmes and have given us permission to contact you, we will send you

information and updates on our work by your preferred channel (email / post). We may also provide you with information on our fundraising work as a charity, including requests for support. We may also send you surveys for market research purposes or events from trusted partners we feel would be of interest to you. We will only contact you if we have received your permission and you can opt out of receiving communications at any time by contacting data@scifest.co.uk or by clicking the unsubscribe button at the end of each email communication.

3. RESPONSIBILITIES

EISF's Board of Directors has overall responsibility for ensuring that the organisation complies with its legal obligations.

EISF has appointed a Data Protection Officer (DPO), currently the Chief Operating Officer, to take overall responsibility for how personal data is processed, held and used. The DPO's responsibilities include briefing the Board; working with Heads of Departments to ensure compliance; reviewing Data Protection and related policies; Ensuring that Data Protection induction and training takes place; handling subject access requests; approving contracts with data processors; working with the ICO.

All EISF employees are required to read, understand and accept any policies and procedures that relate to the personal data that they might handle in the course of their work. Our employees and data processors are legally obliged to respect the confidentiality of personal data.

Any failures to follow the policy can therefore result in disciplinary proceedings. Anyone who considers that the policy has not been followed in respect of personal data should raise the matter with the Data Protection Officer in the first instance.

4. SECURITY

Edinburgh International Science Festival and its data processors review the security of all data. If we are made aware of a breach of data, Edinburgh International Science Festival will inform the Information Commissioner's Office and, if required, inform the data subject.

As many of our customers buy tickets online, our website has security measures in place to protect the information you provide us. We conform to the Payment Card Industry (PCI) Data Security Standard and use SSL (Secure Sockets Layer).

5. DATA USAGE

EISF never disclose personal data to any third parties, other than data processors carrying out work on our behalf and working with us to provide a service. This includes mailing, processing orders and card payments, email delivery and website hosting. Examples of this include our Box Office provider, Red61. We also work with a bulk email distributor – MailChimp – to send out e-newsletters to subscribers. All of our data processors have their own data security processes and protocols in place,

in compliance with the Data Protection Act 1998 and GDPR. Our current list of third party data processors includes: MailChimp, Survey Monkey, WuFoo, Eventbrite, Red 61, Corner Shop PR, Pi Communications, Forth Tech, We Are Everyone, Venue Partners.

We may share your access requirements with venue partners if you have given consent, in order to support your visit. We may also share anonymised data with GDPR compliant data companies to produce market research information.

5.1 Lawful Basis

One of the data protection principles requires that personal data is “processed lawfully, fairly and in a transparent manner”. For processing to be lawful, GDPR states that organisations must record the legal basis for the personal data that they hold. The following have been identified as legal bases and EISF has produced a series of documents reviewing the basis for each data subject type it holds.

- consent of the data subject
- processing is necessary to achieve a data subject’s legitimate interest
- processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Processing is necessary for compliance with a legal obligation
- Processing is necessary to protect the vital interests of a data subject or another person
- Processing is necessary for the performance of a task carried out in public interest or in the exercise of official authority vested in the controller

Edinburgh International Science Festival processes personal data under a number of lawful basis for a variety of different reasons.

Consent: We process personal data under the lawful basis of consent for our marketing newsletters, photography/videography/audio, job alerts and volunteer lists and involvement with Edinburgh International Science Festival groups, such as the Youth Consultation Group and the Youth Science Team.

Legitimate Interest: We process personal data under the lawful basis of legitimate interest for friends, content suppliers, supporters and suppliers of the Science Festival, those on our invite list for special Science Festival events and those involved in the Edinburgh International Science Festival Call for Ideas.

Contract: We process personal data under the lawful basis of contract when an individual or a company enters into a contractual agreement with Edinburgh International Science Festival.

5.2 Photography

When a photographer commissioned by Edinburgh International Science Festival is present at any of our events, we may use the resulting images on this website and in publicity materials. Attendees will be alerted that photography will be happening through announcements or through prominent signage, and permission to use the images for promotional purposes is requested from the main subjects in the images or video (or their parents/carers) at the time the photographs are taken. However, if you have a valid reason why an image should not be used, please contact us at data@scifest.co.uk. You can request the removal of your image at any time by contacting data@scifest.co.uk, in which case we will endeavour to remove the image where possible. Instances where this might not be possible are on social media if the image has already been shared, or in marketing materials that have already been printed.

5.3 Retention

We will retain your data for as long as we have a relationship with you and/or as long as necessary for the purpose it was collected. This covers supplying services to you (or you to us) or providing you with information about the services you request. We may also need to retain your information beyond the term of our relationship for legal and financial compliance reasons, including to evidence the relationship between us.

6. RIGHT OF ACCESS

Individuals who are the subject of personal data have a general right of access to the personal data which relates to them. Individuals can gain access to their information by means of a 'subject access request'.

You can make a Subject Access Request for a copy of the personal data that we hold about you by contacting the Data Protection Officer (DPO) at EISF. We require proof of identity before we can process this, such as a driving licence. We aim to provide such information within 40 days of the request.

When it receives a request, EISF will supply a copy of the personal data held. This could include name, contact details, audio visual recordings, financial details, ID documents etc. EISF will also provide a note of who that data is disclosed to and the reasons for processing. Also, the period for storing the personal data or, where this is not possible, the criteria for determining how long we will store it.

EISF will also notify the enquirer about their right to request rectification, erasure, restriction or to object to such processing and the right to lodge a complaint with the ICO or another supervisory authority.

6.1 Rectification and erasure

Individuals have the right to have inaccurate personal data rectified. An individual may also be able to have incomplete personal data completed – although this will depend on the purposes for the processing. This may involve providing a supplementary statement to the incomplete data.

If EISF receives a request for rectification, it will take all reasonable steps to ensure that the data is accurate. If EISF believes that the personal data is already accurate, it can inform the enquirer that it will not be amending the data, explaining its decision and of their right to make a complaint to the ICO.

All requests are recorded in a Data Request Log that is the responsibility of EISF's Data Protection Officer.

Under the General Data Protection Regulation (GDPR) individuals also have the right to have personal data erased. This is also known as the 'right to be forgotten'. Individuals have the right to have their personal data erased if, for example:

- the personal data is no longer necessary for the purpose it was originally collected or processed for;
- it relies on consent as lawful basis and the individual withdraws consent;
- EISF is processing the personal data for direct marketing purposes and the individual objects to that processing;

If you have any questions on the use of your personal data, please contact the Data Protection Officer at data@scifest.co.uk or by posting your request to the Data Protection Officer, Edinburgh International Science Festival, Harbourside House, 110 Commercial Street, Edinburgh EH6 6NG.

Policy created 18/05/2018. Last updated 04/06/2018.