

## The Dovecot Foundation Group Privacy Policy

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## Purpose of policy

The Dovecot Foundation (“Dovecot”) is committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop a better understanding of our patrons, clients and customers, and in turn to provide you with relevant and timely information about the work that we do as a working tapestry studio and contemporary art gallery. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we and our operating company, Dovecot Studios Limited, collect and use the information we collect from you directly and from third parties.

We use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

What information we may collect about you.

How we may use that information.

In what situations we may disclose your details to third parties.

Our use of cookies to improve your use of our website.

Information about how we keep your personal information secure, how long we maintain it for and your rights to be able to access it.

If you have any queries about this policy, please contact the Director, Dovecot Studios, 10 Infirmary Street, Edinburgh EH1 1LT or email: [info@dovecotstudios.com](mailto:info@dovecotstudios.com).

## Who we are

The Dovecot Foundation is a charity registered in Scotland with registered charity number SC041370. We are also registered as a company in Scotland with registration number SC375263.

Our mission is to advance and support visual arts, craft and design at a national and international level in Scotland.

The Dovecot Foundation has a range of cultural and educational objectives. Trading activities carried on in support of The Dovecot Foundation’s charitable purposes are delivered by Dovecot Studios Limited, a company in Scotland with registration number SC214852.

Any profits made by Dovecot Studios are covenanted back to The Dovecot Foundation for re-investment in the continuation of our charitable mission.

## Information collection

We collect various types of information and in a number of ways:

## Information you give us

For example when you register on our website, buy tickets to an exhibition, talk or similar event, or make a donation, we’ll store personal information you give us such as your name, email address, postal address, telephone number and, where necessary to complete a transaction, card details. We will also store a record of your purchases and donations.

## **Information about your interactions with us**

For example, when you visit our website, we collect information about how you interact with our content. When we send you a mailing we store a record of this, and in the case of emails we may keep a record of which ones you have opened and which links you have clicked on.

## **Information from third parties**

We may occasionally receive information about you from third parties. For example, we may use third party research companies to provide general information about you, compiled using publicly available data.

## **Sensitive personal data**

Data Protection law recognises that certain categories of personal information are more sensitive, such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about our patrons, clients or customers, unless there is a clear reason for doing so.

As an example, we may be required to collect health and other sensitive information about participants in our education programme activities as a condition of agreements in place with public funding bodies (such as Creative Scotland), or to ensure we meet our obligations to patrons with special access or support needs. We will never share sensitive personal data you have provided to us with any third parties unless we are strictly required to do so by law and will only provide it to funders after it has been anonymised.

## **Legal basis**

Dovecot takes your privacy very seriously and will never disclose, share or sell your data without your consent, or unless strictly required to share it with third parties by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

There are **four** bases under which we may process your data:

### **1. Contract purposes**

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of cancellation of an exhibition, talk or similar event, or in the case of problems with goods or services you have ordered or your payment for them.

We may need to collect and store personal information from you in connection with a job application. We will retain any such information held in this connection for six months following the closing date for an advertised post.

### **2. Legitimate business interests**

In certain situations we collect and process your personal information for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below the situations where we may use this basis for processing.

- For the purpose of keeping you informed about our future programme, artistic projects and forthcoming events we think you may be interested in.
- To allow us to maintain up to date lists of patrons and supporters we wish to invite to special events, or to whom we want to promote special offers, linked to their past or potential future interest in Dovecot's artistic work, exhibitions and public events programme.
- To allow us to develop existing customer and patron relationships arising from Dovecot's commercial trading activities, as part of our efforts to sustain the artistic and educational activities we carry on in pursuit of our charitable purposes.
- To promote awareness of ways in which we think you may be interested in extending your support for Dovecot through donations and other forms of voluntary giving, as well as through purchases of our goods and services.

### **3. With your explicit consent**

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

### **4. Legal obligation**

Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example, government bodies and law enforcement agencies).

### **Marketing communications**

We aim to communicate with you about the work that we do in ways that you will find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for direct marketing communications by post and email. In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. In the case of email, we will give you an opportunity to opt out of receiving them during your first purchase with us. If you do not opt out, we will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.

We may also contact you about our work by telephone however we will always get explicit consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to your purchases (as above).

### **Other processing activities**

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.
- We may analyse data we hold about you in order to identify and prevent fraud.
- In order to improve our website we may analyse information about how you use it and the content and ads that you interact with.

- We may use profiling techniques to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you and we will only approach you as part of a fund-raising campaign if we have your explicit consent to do so.

In all of the above cases we will keep your rights and interests to the fore and you will always have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy.

Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

### **Third parties**

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our operating subsidiary company, Dovecot Studios Limited, when it is necessary for them to be able to provide you with products or services that you've requested.
- To our own service providers who process data on our behalf and on our instructions (for example our ticketing system and online shop software providers). In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

### **Cookies**

A '**cookie**' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Using your browser settings (in, for example, Internet Explorer, Safari, Firefox or Chrome) you can set which cookies to accept and which to reject. Where you find these settings depends on which browser you use. Use the "Help" function in your browser to locate the settings you need. Be aware, however, that if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>.

### **Your debit and credit card information**

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard at:

[https://www.pcisecuritystandards.org/pci\\_security/](https://www.pcisecuritystandards.org/pci_security/)

Dovecot, its operating subsidiary company, and/or our third party ticketing and online shop service providers, may optionally allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS and in a way where none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

### **Maintaining your personal information**

We store your personal information indefinitely such that for any subsequent purchases you make we are able to link them back to a single unique record that we hold for you on our system.

If there are aspects of your record that are inaccurate or that you would like to remove, you can do this by using the contact details at the end of this policy.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

### **Security of your personal information**

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

When you subscribe to our mailing list your personal details are held on our *etapestry* database which is provided by Blackbaud Europe Ltd, a company registered in Scotland. You can find Blackbaud's privacy policy here:

<https://www.blackbaud.co.uk/privacy-policy.aspx>

When you book a ticket to one of our exhibitions or events your data is processed by Eventbrite which operates in the UK, but is registered in California, USA, and is therefore outwith the European Economic Area. Eventbrite participates in and complies with the EU-US Privacy Shield Framework. You can read more about this framework and access Eventbrite's privacy statement at:

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lg=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB)

Purchases from our online shop are handled on our behalf by Stripe Payments Europe Ltd, which is registered in the Republic of Ireland. Stripe Payments Europe Ltd is owned by Stripe Inc, registered in the USA, which provides payment services from systems located within the United States and other countries outside of United Kingdom. Stripe is certified under the EU-US Privacy Shield. Stripe's privacy policy can be viewed at:

<https://stripe.com/gb/privacy>

### **Your rights to your personal information**

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the end of this policy if you would like to exercise this right.

### **Contact details and further information**

Please get in touch with us if you have any questions about any aspect of this Privacy Policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Director  
Dovecot Studios  
10 Infirmary Street  
Edinburgh EH1 1LT  
[info@dovecotstudios.com](mailto:info@dovecotstudios.com)

### **Complaints**

Dovecot only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Information Commissioners Office via its website at: <https://ico.org.uk/concerns/handling/>.