



# The Seamus Ennis Arts Centre

## Privacy Policy

### Privacy Statement

The Seamus Ennis Arts Centre understands that the privacy of its users is important. To that end, we have adopted the following policy regarding the collection, use, and dissemination of personal information requested from visitors to this site. Personal information is information associated with a user's name or personal identity. We are providing this policy below so that you may understand the terms and conditions associated with the provision of any personal information to us. Please note, however, that this policy has been developed with the recognition that Internet technologies continue to develop and evolve rapidly, and that such changes may require us to alter our Privacy Policy. Any such alterations will not affect our general commitment to the protection of our visitors' privacy. We will post any changes to our Privacy Policy on this page. Your continued use of this Website constitutes acceptance of such terms and policies.

### Purpose of Site

This website has been designed, created, and is coordinated by TSEAC to promote and inform you about all our events and activities.

Any data that you share with us via TSEAC.ie will be processed and stored in compliance with the EU General Data Protection Regulations, as enacted in the Data Protection Bill 2018.

This website may include links to other external sites, including ticketing partners. We are not responsible for the content or quality of any material contained on these sites and links should not be taken as an endorsement. We would advise you to check the privacy policy of any website that you may have concerns about.

## **Collection and Use of Personal Information**

You may visit our website without identifying yourself or revealing any personal information.

However, certain transactions that you choose to engage in on this site will require your submission of personal information, including, but not limited to addition to mailing lists, purchase of tickets. We will not sell, swap, rent, or otherwise disclose to any third party any such personal information for commercial purposes.

The information that you provide to us will be used only for its stated purpose.. To accomplish such purpose, TSEAC may disclose the information to its employees, consultants and agents who have a legitimate need to know the information. TSEAC also reserves the right to disclose this information under special circumstances, including disclosures required by law, court order or circumstances under which disclosure, in the sole discretion of TSEAC, is necessary to protect the legal rights, including the intellectual property rights of the centre.

### **What do we use your information for?**

The information we collect from you may be used in one of the following ways:

#### **Event attendance/Class enrolment**

We require contact information for all enrolments/sign ups to be correct so that we can contact you with changes to dates/times of classes or events.

#### **Mailing Lists**

If you have consented to be contacted via our GDPR compliant mailing services we will use your information to:

- Personalize your experience - your information helps us to better respond to your individual needs
- To administer a contest, promotion, survey.
- To send marketing emails – provided you give us your consent, the email address you provide us may be used to send you information and updates

### **Usage Information Collected and Use of Information**

TSEAC may collect other information about users of TSEAC.ie that is not connected with any specific personal identity, such as data about usage and service operation. The following summarizes the types of information that we may collect;

#### **System Information, IP Addresses and Referrers**

When you connect to our website, our web server may record the numerical Internet Protocol (IP) address of the computer you are using, information about your browser and operating system, date and time of access and the internet address and page which linked you to our site. The centre's staff uses such information to help diagnose problems with our server, to administer and improve our website and to generate aggregate statistical reports that analyze general user information and demographics. Unless required by legal process, we do not link IP addresses to anything personally identifiable. This means that user sessions may be tracked by IP address, but a user's identity remains anonymous.

In addition, we ordinarily do not disclose to third parties site usage by individual IP addresses, but may do so in very limited circumstances when complying with law or a legal process, working with consultants assisting us in fixing or improving our site, or in monitoring and improving the security of our network. Our staff monitors search terms that users enter into our Search Engine, but this tracking is never associated with individual users.

### **Cookies & Online information**

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. They make it possible for us to provide our online ticketing service and track visitor statistics, such as returning visitors or the way people use the site. They help us to improve our site and to deliver a better and more personalised service to you, including speeding up searches on the site.

Currently (as allowed by the Data Protection Commissioners office) we operate cookies on the basis of 'consent by implication', which means that we assume you are happy with our use of cookies if you continue to use the site once made aware of them.

If you don't want us to use cookies when you use our website, you can adjust your internet browser settings not to accept cookies or delete them after your visit. Your web browser's help function should tell you how to do this. Alternatively, you can find information about how to do this for all the commonly used internet browsers on the website: <http://www.aboutcookies.org>. This website will also explain how you can delete cookies which are already stored on your device.

Please note that if you adjust your browser settings not to accept cookies, this may result in your being unable to use some of the facilities or features on our website, including any account-based features, such as booking events.

### **First-Party Cookies on TSEAC.ie**

#### **Essential Cookies:**

Session Cookies - These cookies are temporary cookies that are removed once the transaction has been completed or you log out. It is not possible to purchase anything on the website without accepting these cookies. These cookies help manage your cart at TSEAC.ie, as well as enabling you to log in and use your customer account. Our ticketing system is powered by Ticketsolve, and you can learn more about their privacy policies [here](#).

Functional Cookies - We may collect technical information about your computer, including where available your IP address, operating system and browser type, to ensure that content from our site is presented in the most effective manner for your device or computer. We do not make any attempt to connect technical information with any individual's personal information.

Compliance Cookies - These cookies allow us to know whether or not you have been informed and given consent to the use of cookies on the site and therefore do not need to be presented with this consent request message again.

## **Non-essential Cookies:**

### **Google Analytics tracking**

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. Examples of the type of information this gives us include the number of visitors to the site, where visitors have come to the site from and the pages they visited. The cookies collect information in an anonymous form, as such we don't know who is using our site. We use the information on how people use our website to compile reports and to help us improve the site.

### **Email and web tracking cookies:**

In our official ezines (sent using Mailchimp) we include tracking so that we can tell how much traffic is referred to our site and we can track, at an individual level, whether the user has opened and clicked on the email. We rarely use the latter information at a personal level, rather we use it to understand open and click rates on our emails to try and improve them. Sometimes we do use the personal information e.g. to re-email people who didn't click the first time. If you want to be sure that none of your actions on our email are tracked then you should use your browser to control cookies or unsubscribe from our newsletter using the unsubscribe link at the bottom of the email. No other emails that we may send you have tracking included, for example personal correspondence or emails with invoices or receipts attached.

### **Conversion tracking cookies:**

To help us optimise the impact of our advertising budget, we use advertising conversion tracking and targeting pixels or custom URL's, which enable us to track the pages that have been visited or purchases made by people who have seen our advertising campaigns. This helps us measure the effectiveness of advertising campaigns on these networks and optimise these campaigns by using their insights or reporting options – making them data processors. Results are given as non-personalised, aggregate figures. We make no attempt to match this information with any personal data that we have from our booking process. The networks that we currently use are: Google and Facebook/Instagram. See below for information on how to find out more about their Data Policies.

### **Third-Party Cookies:**

As well as the advertising conversion tracking and targeting pixels outlined above, where we are essentially the data controller, we also host various third-party tools and services on the website to enhance your experience, help you share information or enable us to optimise online advertising campaigns (see section below on Online Advertising). These tools include services to enable us to embed our media into the website – e.g. to embed video, we use tools from YouTube and Facebook.

These tools or services often include cookies from these third-parties. TSEAC is not the Data controller for the information gathered via these cookies, and has no access to the information. You can find out more about the third-parties cookie policies and how to opt-out of their processing activity via the links below.

**Google services** - Including YouTube. When you use the website, Google is able to track information about the way you interact with the embedded video, technical information about the devices and browsers you are using. If you are also logged into your Google accounts, they are also able to connect your use of the site with your profile. They are also able to create remarketing lists based on pages visited or actions that TSEAC can then use for advertising purposes if we wish. We have no access to the information. You can find out more about your Google privacy choices [here](#).

**Facebook** - Including Instagram. Our website hosts and uses Facebook Business Tools including their like & share buttons, embedded video and the Facebook Pixel. The Pixel enables Facebook to carry out some of their Data Processor duties for us (eg track conversions as previously mentioned). It also enables Facebook to carry out their own data processing based on their data & cookie policies – including tracking your activity (whether or not you are logged into your Facebook account), to supply other business tools such as custom audiences and monitor their product use and performance. You can find out more about how Facebook uses cookies [here](#).

This should not be seen as an exhaustive or complete list of the services we use, or might use in the future, when embedding content, but these are the most common. We will update this list, as and when we put other third-party tools or services in place. We will always ensure a third-parties GDPR compliance before putting them in place with a Data Protection Impact assessment.

### **Cookies on linked websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over cookies that other website might use so we would advise you to check their privacy and cookie policy

### **Security Precautions**

This site has security measures in place to protect the loss, misuse and alteration of the information under our control. Unfortunately, due to the nature of Internet communications, no data transmission over the Internet can be guaranteed to be completely secure. While TSEAC remains committed to protecting the privacy of our users, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems. We do so by using secure technology, privacy protection controls, and restrictions on employee access, however, we make no representations regarding the veracity of such measures.

### **Personal Data Storage**

Personal data (the reasons for which it is collected are outlined above) will be stored on TSEAC's secure database which is only accessed by mandated staff members. Information for class lists/ mailing lists may be filed in password protected Excel Sheets, as part of TSEAC's access to the Microsoft Suite. These sheets can only be accessed by mandated staff members.

Any personal data that we request about the children who take part in events – including taking pictures and video - will always be gathered with the express consent of the parent or guardian.

### **Pictures and Video**

“The use of images play an important role in many aspects of work with children, young people. Images in many formats can be used to record, document, demonstrate, promote and celebrate activities and experiences. Increasingly, accessible and diverse technology has meant that recording, sharing, disseminating and publicising images is more widespread than ever before.” (Source. The Arts Council Guidelines for taking and using images of children and young people in the arts sector

TSEAC has a clear policy in place for capturing images of children for documentation, archiving or promotional use:

Images can only be captured with the written consent of the child’s parent or guardian.

Withholding of a consent must never affect or limit the child's experience of the activity they are taking part in.

Even if a parent has given consent, if a child decides that they don’t want their picture taken, their wishes must be respected.

Capture of images should be done in a respectful way, with no or minimal impact on the focus or experience of the children, and with the centre’s Child Protection Statement in mind.

Care must be taken to avoid inadvertent discrimination or stereotyping of any child, particularly on the basis of disability, ethnicity or gender.

Accompanying photo credits should be mindful of giving information that could be used in a way that threatens the child’s safety – eg their name, their school or specific address details.

Images featuring unidentifiable aspects such as a child’s hands, silhouette or the back of their head can be captured but it must be impossible to identify or recognise the child based on that photograph.

### **Use of CCTV within TSEAC**

We monitor and record images using closed circuit television at our venue. We do this for the purposes of crime prevention, child protection and public safety. The footage is only accessible to authorised members of staff and will only be shared if requested by An Garda Síochána.

### **Your Rights**

In line with GDPR and the Data Protection Act 2018 you have the right to:

Make a Subject Access Request - You have the right to access information we hold about you. If you wish to exercise your right of access, you must submit a written request to [info@TSEAC.ie](mailto:info@TSEAC.ie). The information will be delivered within 30 days of your request. Please note that we will ask you to provide proof of your identity before we supply the information to you.

To have your information updated or corrected - if you discover that any of the data that we are holding is out of date or inaccurate, please get in touch via [info@TSEAC.ie](mailto:info@TSEAC.ie) and we will update the information.

To object to direct marketing - You have the right to ask us not to process your personal data for marketing purposes. Email marketing will only ever take place if we have had consent from you for that purpose. You can unsubscribe from email marketing at any time via the links at the bottom of every email. To have your information deleted from our records, including photos or video - Unless there is a compelling legal basis for us to retain your data, you can ask us to delete your information. Just email [info@TSEAC.ie](mailto:info@TSEAC.ie) to request this.

### **Updates to this Privacy Policy**

This Privacy Policy will be audited every six months to ensure continued compliance with regulations. Interim updates will also be made where we change any policies or procedures, bring new third-party Data Processors on board, or to reflect urgent changes or developments in the regulations.

Last Updated February 2023