

Create London Privacy Policy

This privacy policy explains how we collect and use your personal information, how we keep it safe and protect your privacy and what your rights are regarding this information. This privacy policy relates to our website <https://createlondon.org/> and any other Create London service.

If you have any questions, please contact Victoria Norton:
victoria@createlondon.org

Who we are

In this policy 'Create London, 'we' or 'our' refers to Create London, Company Registered in England and Wales No. 7586759 and Registered Charity No. 1146063. Create London commission bold, radical and socially-engaged art and architecture that is woven into the fabric of everyday life.

Our registered office address is: Barbican Centre, Silk Street, London, EC2Y 8DS

If you would like to contact us, please telephone or email our data protection representative Victoria Norton: victoria@createlondon.org / +44 (0)20 7382 7284.

How do we collect personal information about you?

We collect personal information in the following ways:

- When you sign up to our mailing lists to receive our regular newsletter, information about project launches, public invitations to our events and other information relating to our activities. From time to time, we may also invite you to offer us feedback through participating in an online survey.
- When you book tickets or attend any of our events.
- By telephone when you are speaking to us.
- From your correspondence.
- If you participate in workshops or learning activities.
- When you work with us.
- If you donate to the organisation.
- Through search/analytics providers used on our website
- Through social media; depending on your settings you may allow us access to information when for example you make a public comment on one of our posts.

For information about our use of cookies, please see our Cookies Policy below.

What personal information do we collect?

Depending on the reason for which we need your information, we may collect the following:

- Your name
- Your contact details (including postal address, telephone number, email address and/or social media identity);
- Your date of birth
- Your bank or credit card details where you provide these to make a payment;

- If you apply for a job with us, we will collect information necessary for us to process these applications and assess your suitability (which may include things like employment status, previous experience depending on the context, as well as any unspent criminal convictions or pending court cases you may have);
- Information about your activities on our website and about the device you use to access these, technical information (such as your IP address, browser type, geographical location and time zone setting) and information about your visit (page response times, length of visits to certain pages etc);
- Information as to whether you are a taxpayer to enable us to claim Gift Aid;
- Demographic information such as age, nationality, gender identity, sexuality and ethnicity information for monitoring purposes; and
- Any other personal information you provide to us.

Some of the information that we collect about you is considered sensitive and is considered as a separate category under data protection legislation. This includes, but is not limited to, information about sexuality, gender and race. We only collect this information to ensure that we are meeting our objectives in terms of reaching our target audiences and to fulfil our reporting obligations to our funding bodies. All information submitted for reporting purposes is anonymised.

How do we use your information

We use the information held about you to:

- Contact you to tell you about our activities;
- Contact you about your donation/purchase/event booking;
- Maintain our organisational records;
- Respond to your questions or comments;
- Manage our events;
- Further our charitable objectives;
- Display content to you in an appropriate way for the device that you are using, for example if you are using a mobile phone or a tablet to view our website;
- Compile reports on our work;
- Safeguard our staff and volunteers;
- Conduct due diligence and ethical screening;
- Process your application for a job;
- Audit and administer our accounts;
- Meet our legal obligations, for example to perform contracts between us and you, and meet obligations to our funders, regulators, government and/or law enforcement bodies;
- Carry out fraud prevention and money laundering checks;
- Run and personalise projects;
- Profile our audiences in various geographical locations;
- Administer and improve our website, prevent or detect fraud or abuses of our website and enable third parties to carry out technical, logistical or other functions on our behalf;
- Provide aggregate statistics about our audiences, sales, traffic patterns and related site information to reputable third parties (these statistics will include no personally identifiable information); and
- Share selected information with The Audience Agency (an arm of Arts Council England) for the purposes of building a national profile of cultural audiences.

Children's data

We may process data of people under the age of 16 who participate in our programmes.

Where we do, access to this information is limited to those staff requiring it in order to run the programme and provide necessary reporting only to our funders.

We will securely store this information for a reasonable period and as required or for legal reasons.

What is the legal basis for processing your information?

Data protection laws mean that each use we make of personal information must have a "legal basis". The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

Specific consent

Consent is where you have given us permission to use your information in a certain way, for example when you sign up to receive our newsletter and other information about Create London's activities via email, post or telephone. Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

Performance of a contract / take steps at your request to prepare for entry into a contract

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be if you are buying something from us (for instance tickets to an event), or applying to work with us.

Legal obligation

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases, we may need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator or Information Commissioner, or to use information we collect about you for due diligence or ethical screening purposes.

Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance in the case of an emergency impacting individuals at one of our events, or a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

Legitimate interests

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their "legitimate interests" (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities Create London carries out with personal information. Some examples not

mentioned under the other bases above where we are relying on legitimate interests are:

- analysis and profiling of our supporters using personal information we already hold;
- use of personal information when we are monitoring the use of our website or apps for technical purposes;
- use of personal information to administer, review and keep an internal record of the people we work with, including, but not limited to, supporters, artists, architects, researchers, freelancers and industry contacts;
- sharing of personal information between relevant team members and consultants to carry out the work of Create London;
- Disclosure and Barring Services (DBS) checks may necessary for those working with children, young people and vulnerable people. Any DBS checks are justified by law. DBS checks cannot be undertaken based solely on the consent of the subject.
- generating anonymised data for submission to our funding bodies including, but not limited to, Arts Council England in order to complete our reporting obligations to them.

We only rely on legitimate interests where we consider that any potential impact on you (positive or negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others') interests in us using your information in this way.

When we use sensitive personal information (please see the "What personal information we collect" section above), we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law for using this type of information (for example if you have made the information manifestly public, we need to process it for employment, social security or social protection law purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

How do we keep your information safe?

We take all appropriate technical and organisational controls to keep your data safe, including encrypting our online forms and holding information on a protected network.

How long do we keep your information?

We hold information collected for different purposes for varying amounts of time. For example, we will hold information that you supply when signing up to our newsletter indefinitely until you ask us to delete it.

We will hold information supplied for reporting purposes for as long as is required by our funding obligations or for our own audience target objectives. This is usually at least one year.

We are also required to hold some information which is determined by legal or operational considerations, for example for tax or health and safety purposes. The length of time we hold this information will be determined by the specific legal or operational requirement.

Sharing your information

We will never sell or share your information with third parties for marketing purposes.

However, we may disclose your information to selected third parties in order to carry out our objectives and obligations as set out in this policy. These may include;

- Business or project partners, suppliers and sub-contractors who may process information on our behalf. For example, payroll service providers or organisations working with us on delivering a project.
- PR or marketing services (only when performing services for Create London)
- IT service providers, for example website hosting or email marketing.

Should we be under a legal or regulatory duty to do so, we may share your details to the police, regulatory bodies of legal advisors, and / or where we consider this necessary, to protect the rights, property or safety of Create London, its staff, visitors, users or others.

Emails from us

If you contact us (by any method), we may keep a record of that correspondence and use your contact details to reply to you.

Please note, e-mail is not a fully secure means of communication. Whilst we try to keep our systems and communications protected against viruses and other harmful effects we cannot guarantee this.

If you no longer wish to receive marketing from us by email, you can unsubscribe via the link in our email or by contacting Victoria@createlondon.org. Please note that it is not possible to 'opt-out' of receiving communication from us which relates to any purchases, donations or bookings.

What rights do you have regarding your information?

- You have a right to request a copy of the information we hold about you. If you would like a copy of some or all of your personal information, please contact Victoria@createlondon.org or contact us at Create London, Barbican Centre, Silk Street, London EC2Y 8DS, [+44 \(0\) 20 73827284](tel:+44202073827284).
- We want to make sure your personal information is accurate and up-to-date. You may ask us to review and amend your information at any time.
- You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.
- You have a right to withdraw your consent for us to hold your information and subject to certain exceptions, we will delete your data upon request.
- If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.
- You have a right to lodge a complaint with a supervisory authority.
- If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your information. If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

We will aim to complete any of the above requests within one month. If this is not possible, we will tell you why and when you might reasonably expect it to be completed.

Linked sites

Create London administrate additional websites, currently including:

- <https://www.whitehouseart.org/>

If you visit any of these websites, including their subdomains, you accept and consent to the practices described in this Privacy Policy.

There are links out to websites not controlled by Create London, given on our websites. These links should not be taken as endorsements of these third-party websites. We are not responsible, nor do we have control of the content of these sites, and we do not have input to their privacy policies.

Cookies Policy

What are cookies?

A “cookie” is a small text file that is placed on a website user’s device/computer hard drive by a website. There are several types of cookie. This policy explains how we use cookies on our website.

The types of cookies we use on our website are set out below:

Google Analytics

Google Analytics is used widely by websites to collect information about how website visitors use a site. We will use Google Analytics cookies to collect information about how users use the websites and to improve the websites. Google Analytics collects information in an anonymous form and will not allow us to identify you or collect any personal information about you. Google Analytics does not track your internet activity after leaving the website.

Social media cookies

The website contains buttons and content from social media sites such as Facebook, Twitter, and YouTube, so that you can easily share content from the website with your social media networks. If you use these features, these social media sites may use their own cookies. Information on how these are used can be found on their respective websites.

Website cookie acceptance

We will use a cookie to record if users have accepted the use of cookies on the website.

This cookie will be stored on your device/computer if you have consented to our use of cookies by indicating your consent to the pop-up message on the website.

Internet browsers

Internet browsers normally accept cookies by default. However, it is possible to set an internet browser to reject cookies.

By using the website you are consenting to our use of cookies unless you set your internet browser to reject cookies.

If you do not accept our use of cookies as set out in this policy, please set your internet browser to reject cookies.

Changes to this Policy

This policy was updated on 21 September 2022. Please note that we may update this Privacy Policy at any time, so please check it regularly.