

## Stichting SEA Foundation AVG policy

Since May 25, 2018, the same privacy legislation applies throughout the EU: the General Data Protection Regulation (AVG)

Stichting SEA Foundation is committed to protecting and respecting your privacy. For the purposes of the AVG and any subsequent Dutch legislation covering data protection the Data Controller is Stichting SEA Foundation. This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used. This Policy covers Stichting SEA Foundation in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information.

If you have any questions about this Policy or concerning your personal information please contact info-(=)-seafoundation.eu or by post to Stichting SEA Foundation, Tivolistraat 22, 5017 HP, Tilburg, The Netherlands.

What type of personal information we collect and why we collect it. The type and amount of information we collect depends on why you are providing it. We hold data on people, who do, or might do, the following:

- Visit our site or engage with us at one of our offsite events.
- Take part in our programmes of exhibitions, events and activities.
- Take part, or apply to take part, in our artist programmes including residencies and retreats.
- Buy goods or services from us.
- Support us financially and in other ways.
- Work, or apply to work at SEA Foundation.
- Subscribe to our e-bulletins or sign-up online or in person to receive regular updates from us.

We only collect the information that's necessary to carry out our business, provide the particular service you've requested and to keep you informed.

- Personal information might include: First name, last name, username, or similar identifier, name of partner/spouse/next of kin, marital status, title, date of birth, photograph, gender and preferred gender pronoun.
- Dietary information, health issues or allergies.
- Address, delivery address, city or places of residence, email address and telephone numbers.
- Employment status, financial information including bank details to make payments to you like name, email, address and payment information to process payments to us.

We use online information and cloud-based systems including Mailjet, Eventbrite, Office, Google apps, and all the payment connections of woocommerce. We collect information from you when you give it to us directly. You may provide your details when you ask us for information or when you are applying for an opportunity, to volunteer, to attend Stichting SEA Foundation for a residency or event etc. or you contact us for any other reason. Your information may be collected by a system that we use to collect this information e.g. mailjet, but we ensure these organisations are AGV compliant. Your information may be provided to us by other organisations if you have given them your permission. This might for example be an organisation that Stichting SEA Foundation is working in partnership with.

When it is available on social media: Depending on your settings or the privacy policies applying for social media and messaging services you use, like personal websites, Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

We will use your personal information in several ways which reflect the legal basis applying to processing of your data. These may include:

- Sending information to you about Stichting SEA Foundation.
- Processing applications for jobs or opportunities.
- Providing you with the event or opportunity you have booked for or successfully applied for.
- Processing any payment due to or from us.
- Processing donations, including processing gifts.
- Organising volunteering activity you have told us you want to be involved in.
- Sending you communications with your consent that may be of interest including information about our activities, opportunities, campaigns and appeals and fundraising activities.
- Sending you postal communications about events you may be interested in.
- Maintaining our organisational records and ensuring we know how you prefer to be contacted.
- To allow us to use photography, audio or film recording of you for the purpose to which you have agreed.

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Where you have provided information to us for the purposes of requesting information or receiving information, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us, for example when we send out ebulletins we proceed on the basis that you have given us consent on the sign-up form to use your personal data to send these to you. You may withdraw consent at any time by emailing us at [info-\(=\)-seafoundation.eu](mailto:info-(=)-seafoundation.eu). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- Where you have provided information either on your allergies and/or medical conditions.
- It is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract.
- It is necessary to comply with our legal obligations. We are required to comply with relevant law and regulations when processing employment opportunities, during your employment, when hiring our van and when you register for our opportunities.
- Where the purpose of our processing is the provision of information to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.

We also rely on the fact that it is necessary for your legitimate interests that we:

- Process the personal data you have provided in applications for artistic opportunities as you have applied for these.

- To process the personal data you have provided when you register for an event, residency or other artistic opportunity you are attending as an artist, contributor or audience member as you have applied for these.
- To send out mail outs on our activities and events to those that have attended an event in the past, we have come into contact whilst conducting Stichting SEA Foundation business, or we think would be interested in them based on their job role.

We understand the importance of security of your personal information and take appropriate steps to safeguard it:

- Paper copies of personal data are kept in locked cabinets and the keys are kept in the safe. All our systems are password protected with some data access appropriately restricted to the senior management team. Application passwords are only available to those that require access.
- We always ensure only authorised persons have access to your information and that everyone who has access is appropriately trained to manage your information.
- We destroy any personal data (paper and electronic) that is no longer required either because it is after the date that we need to keep it or because we just can't justify holding it (this includes electronic files).

Who else has access to your information?

Third parties who provide processing services for us, for example WooCommerce, Payment services, Eventbrite, Mailjet and Submittable and our mailout service. We select our third-party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection or in the case of large service providers we have gained assurance that they are acting in accordance with GDPR. Third parties if we run an event or programme in conjunction with them. We will let you know how your data is used when you register for these events or programmes.

Analytics and search engine providers that help us to improve our website and its use. Although analytics information is anonymised. Owing to matters such as financial or technical considerations the information you provide to us may be transferred to countries outside the European Economic Area (EEA). We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA by ensuring that there are appropriate safeguards in place with any third parties processing your data outside The EEA. We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interests, other than this, we will not share your information with other organisations without your consent.

We would really appreciate it if you let us know if your contact details change. You can do so by contacting us at [info-\(=\)-seafoundation.eu](mailto:info-(=)-seafoundation.eu)

In the event of a data breach we will inform the relevant individuals and report the incident.

“Cookies” are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. We use cookies to enhance your experience and to anonymously collect data about your visit to the website. They are stored on your hard drive to allow our website to recognise you when you visit. If you prefer not to receive cookies, you can adjust your internet browser to refuse cookies or to warn you when cookies are being used. This site will work more efficiently if receipt of cookies is enabled but it will still operate correctly if you disable cookies.

We appreciate that our users are of all ages. Where appropriate we will ask for consent from a parent or guardian to collect information about children (under 16s).

We will hold your personal information for as long as it is necessary for the relevant activity. Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting until you have informed us that you wish to no longer hear from us. If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing, more details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request contact us at [info-\(=\)-seafoundation.eu](mailto:info-(=)-seafoundation.eu)

You also have the following rights:

- The right to request rectification of information that is inaccurate or out of date.
- The right to erasure of your information (known as the “right to be forgotten”).
- The right to restrict the way in which we are dealing with and using your information.
- The right to request that your information be provided to you in a format that is secure and suitable for reuse (known as the “right to portability”).
- Rights in relation to automated decision making and profiling including profiling for marketing purposes. All these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy.

To exercise any of these rights, you should contact the Head of Operations at the above address. Changes to this Privacy Policy. This Policy may be changed from time to time and we will advertise this on our website, if we make any significant changes we will contact you directly with the information. Do please check this Policy each time you consider giving your personal information to us. This Policy was last updated on the 31. December 2018