



## Privacy Policy – Prospective Licence Holders

At Bow Arts, we are committed to protecting your privacy. This policy sets out how we collect, use and store your personal information when you register for a Bow Arts studio, Live Work Space or Tethered Accommodation.

### Who we are

Bow Arts Trust is a registered charity (number 1046958) and a registered company in England and Wales (number 03031923). Bow Arts Trust registered address is 183 Bow Road, London, E3 2SJ.

Bow Arts Trading Limited, a registered company in England and Wales (number 10072462) is a wholly owned subsidiary of Bow Arts Trust, which trades on Bow Arts' behalf. Bow Arts Trading Limited registered address is 183 Bow Road, London, E3 2SJ.

Within the context of this policy 'Bow Arts', 'we' and 'our' refer to both the charity and its subsidiary. Both organisations are data controllers under data protection rules.

Bow Arts is committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

If you have any questions about our privacy practices, please contact our Executive Director, Enterprise & Operations by:

- Writing to us at Bow Arts Trust, 183 Bow Road, London, E3 2SJ
- Calling us on 020 8980 7774
- Emailing us at [dataprotection@bowarts.com](mailto:dataprotection@bowarts.com)

By providing us with your information, you consent to our collection and use of the information you provide in the way(s) set out in this policy. If you do not agree to this policy, please do not use our website, social media or services.

### Where we collect information about you from:

**When you give it to us directly** – when you register with us via our website as part of your application for a Studio, Live Work Space or Tethered Accommodation.

**When you visit our website** – like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies are used by most major websites and work by placing small amounts of information on to your computer. A cookie often contains a unique number, which can be used to recognise your computer when a user of your computer returns to a website that it visited previously.

### What information we collect about you

We collect two types of information from you when you visit our website and register your interest in a Studio, Live Work Space or Tethered Accommodation with Bow Arts:

**Non-personal information** such as website pages accessed and files downloaded. This helps us to monitor how many people use our websites, how many people visit on a regular basis and how

popular different pages are. This information doesn't tell us anything about you, it simply allows us to monitor and improve our service.

**Personal information** is any information that can be used to identify you. The type and quantity of information we collect, and how we use it, depends on why you are providing it, but we will only ever collect the information we need, including data that can help us to improve our services.

Personal information which we collect when you register on our website for a Bow Arts Studio, Live Work Space or Tethered Accommodation includes your:

- Name and title
- Contact details (postal and email address, phone number)
- Income bracket and your monthly budget for a studio space
- Education history
- London's Artist Quarter user name
- Tax and employment status

We will also ask you if you self-identify as disabled and, if so, what access requirements you may have. We ask you this so that we can provide you with a Studio, Live Work Space or Tethered Accommodation suitable for your requirements.

We collect this information in order to provide you with the services that you have requested. You don't have to disclose any information to us, however if you do choose to withhold requested information, we will not be able to provide you with these services.

## **What we do with your information**

We collect this information in order to:

- Register you on our system for a Bow Arts Studio, Live Work Space or Tethered Accommodation
- Inform you of any vacancies for Studios, Live Work Space or Tethered Accommodation
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Communicate with you. Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an e-newsletter from us is opened and/or how many links are clicked within the message. The data from this tracking is used in an aggregated and anonymised form.

Information you give us will **NOT** be used for:

- Profiling or wealth screening.

With your consent, we will contact you to keep you up to date with Bow Arts Studio vacancies, Live Work vacancies, Tethered Accommodation vacancies and new studio developments. Occasionally we may include information about partner organisations who are collaborating with us on joint projects. Our forms and website have clear marketing preference questions and we include information on how to opt out when we send you any marketing material. If you don't want to hear from us, please just let us know when you provide your data, by unsubscribing from our newsletters at any time or by contacting us on 020 8980 7774 or [media@bowarts.com](mailto:media@bowarts.com).

## **Sharing your data and keeping it safe**

We take looking after your information very seriously and we ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted and our network is protected and routinely monitored. Unfortunately, information transmitted over the internet is never 100% secure, so while we do our best to try to protect the security of your information, we cannot guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

The information we collect about you will be used by our staff so that we can support you and provide you with the services you have requested. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities.

Bow Arts uses MailChimp as our marketing automation platform. This means that when you sign up to receive updates about Studios, Live Work Space or Tethered Accommodation, you will be added to our MailChimp list. MailChimp (registered in the US) processes your data by collecting and storing the information you give us via our sign up forms in order for us to create and use distribution lists, and send marketing and email campaigns.

When you sign up for a Studio, Live Work Space or Tethered Accommodation on our website, you submit your information through Jotform (also registered in the US). We have a data processing agreement with Jotform which ensures our contractual terms meet EU data protection requirements and reflect our data privacy and security commitments to you.

Although companies outside of the EU may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure all of our suppliers provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside the EEA.

We may also need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

## **How long will we keep your data?**

We will only keep your data for as long as we need to in order to operate the service which you have requested and for as long as required in accordance with legal requirements and tax and accounting rules. When your data is no longer needed, we will dispose of it in a secure manner.

If, following your registration, you take up a Studio, Live Work Space or Tethered Accommodation with Bow Arts, we will request further information from you and keep your information for the period of time specified in our Privacy Policy – Licence Holders. You will be given a copy of this alongside your other licence documents.

If you register for a Studio, Live Work Space or Tethered Accommodation with us, but do not become a licence holder within six years of your registration, we will dispose of your information.

After this time, if you wish to register again for a space with Bow Arts, you will need to fill in a new registration form via our website.

If you are signed up to our e-newsletters, we will re-request your consent to receiving these updates from us every three years to ensure our contact lists are up to date and that you are still happy to hear from us. If you do not respond to our request, you will be removed from our mailing list(s), however you are able to sign up again at any time via our website.

## Your rights

You have various rights under the data protection act and the EU General Data Protection Regulations in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, you can do so by contacting our Executive Director, Enterprise & Operations by:

- Writing to Bow Arts Trust, 183 Bow Road, London, E3 2SJ
- By email at [dataprotection@bowarts.com](mailto:dataprotection@bowarts.com)
- By phone on 020 8980 7774

You will need to tell us what information you would like to see and prove your identity with two pieces of approved identification.

We will aim to respond to your request as soon as possible and always within one month of receipt.

Please note that some of these rights only apply in certain circumstances and we may not be able to fulfil every request. If for any reason we are unable to fulfil your request, we will inform you as soon as possible and always within one month of receipt of the request.

- **Right to access** - you have a right to ask for a copy of any information we hold about you (known as a subject access request).
- **Right to rectification** - we will always endeavour to keep the information we hold on you up to date and would really appreciate it if you can let us know if any of your details change. If you do notice that any of your information is wrong, please let us know so that we can correct it.
- **Right to erasure** - you can ask us to 'forget' you. This means we will stop processing your personal data and erase it from our system. If the information is not necessary for the purpose you provided it to us (e.g. it is no longer necessary for us to use it for the processing of a live licence agreement, and so long as it does not breach any legal obligations we have, we will do so.
- **Right to restrict processing** - alternatively, you may prefer to ask us to restrict the processing of your data. This means that we will keep your information, but will only process it in certain circumstances.
- **Right to data portability** - you have the right to obtain and reuse a copy of the personal information we hold on you to use for your own purposes. We will provide the information in an easily transferable form (usually a CSV file). This right only applies to information that you have provided to us and where we have processed it either with direct consent from you, or for the performance of a contract.
- **Right to object** - you have the right to object to the processing of your information if we have based the processing on a legitimate interest rule or are processing it for direct marketing, historical research or statistical analysis.

- **Rights relating to automated decision making** - we do not carry out any automated decision making or profiling activity.

## Reporting a data breach

If we become aware that there has been a security breach, for example, the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of somebody's personal data, we will report this to the relevant supervisory authority (usually the Information Commissioner's Office and/or the Fundraising Regulator and the Charity Commission) within 72 hours of becoming aware of the breach.

If the breach is likely to cause adverse effects to the individual whose data has been breached, we will also notify that individual as soon as possible.

## Concerns or Complaints

If you have any questions relating to your personal information, please contact our Executive Director, Enterprise & Operations by:

- Writing to Bow Arts Trust, 183 Bow Road, London, E3 2SJ
- By email at [dataprotection@bowarts.com](mailto:dataprotection@bowarts.com)
- By phone on 020 8980 7774

If having contacted us you still have any concerns regarding the way we handle your personal information, you have the right to lodge your concern with the Information Commissioner's Office. Visit <https://ico.org.uk/concerns/> for more information.

## Reviewing this policy

We regularly review our privacy policy and may make changes from time to time in order to keep up to date with data protection legislation and best practice. If we make any significant changes in the way we handle your personal information we will make this clear, either via our website or by contacting you directly.

This policy was last updated in May 2018.

If you have any questions regarding this policy, please email [dataprotection@bowarts.com](mailto:dataprotection@bowarts.com)