



27 Dingley Place  
London EC1V 8BR

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**email** [info@allchangearts.org](mailto:info@allchangearts.org)  
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## **All Change Privacy Policy for Audiences and Donors**

All Change is committed to protecting your personal information and being transparent about what information we hold about you. The purpose of this policy is to explain how we collect and use the information we collect from you.

We use your information in accordance with all applicable laws concerning the protection of personal information. This policy is intended to provide you with relevant information including:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it

All Change is the data controller of your personal information. If you have any questions about any aspect of this privacy policy, please contact All Change's Data Lead using the details below.

### **Who we are**

All Change Arts Limited (All Change) is a company and charity registered in England and Wales (Company number: 1964724, Charity number: 293972).

All Change  
27 Dingley Place  
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Email: [info@allchangearts.org](mailto:info@allchangearts.org)

### **Information Collection**

All Change will only collect information when you interact with us. If you also interact with us as a participant please also read our Participant Privacy Policy. We collect various types of information and in a number of ways:

Information you give us, for example, when you subscribe to our mailing list(s) via the website or make a donation directly to us. We shall store information you give us including your name, email address, postal address, telephone number. We shall also store a record of your donation(s).

Information about your interactions with us, for example how you interact with content on our website. We may keep records of emails we send you and we may also keep a record of which emails you have opened and which links you have clicked on.

On occasion, and only when there is a clear reason for doing so, we may collect additional data which will be anonymised and will not be linked back to a specific individual. This could include sensitive personal data, recognised under Data Protection law as information about health, ethnicity, religious beliefs and political opinions. We may request this information as part of data gathering for monitoring purposes.

When you attend events, we may take photographs of the audience group which may include identifiable individuals. These photographs could be used for several different purposes, including marketing, reporting and archiving. We shall also give notice of photography at our events, our photographers will be clearly identifiable, and we shall provide details to enable you to opt out of any photography. Photographs will not be linked to individuals by name without prior consent.

## **The purpose of processing your data**

All Change collects and processes personal information to enable us to carry out our business. Looking after the personal information you provide and respecting your rights to privacy are very important to us. We shall make every effort to ensure that your personal information is secure and guard it against unauthorised access and loss.

We need personal details from you in order to fulfill our obligations to you. This includes providing you with information about the organisation, and your interaction with us on projects, at events, and may also extend to understanding how best to support you as audience.

## **Legal basis**

Examples of the different legal bases under which we process data are detailed below:

When you give us a donation directly, 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 a query with your payment.

**LEGITIMATE INTEREST:** In certain situations we collect and process your personal data 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 aim to communicate with you about the work that we do in ways that you find relevant,

timely and respectful. To do this we use data that we have stored about you, such as your name and email address, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by email. We shall provide you with an option to unsubscribe in every email that we send to you, or you can alternatively use the contact details in this policy. We may also contact you to ask you to participate in research (online or in person). You are under no obligation to participate in research and, should you provide any further information, All Change will inform you how this further information will be used.

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 that you interact with.
- We may use your data to approach you about potential philanthropic support. If we contact you, you can opt to have no further such contact or have your details removed from our database.

In all of the above cases we shall keep your rights and interests at the forefront to ensure they are not overridden by our interests. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details in this policy or inform the member of staff who contacted you. Please bear in mind that if you object to data processing, this may affect our ability to carry out tasks that may be for your benefit.

When other legal bases are not appropriate, we shall instead ask for your explicit CONSENT before using your personal information in that specific situation. In these cases All Change must ensure you actively opt in to data collection before your data is collected, used and stored. Consent must be given by a clear affirmative act such as a written statement, including by electronic means (e.g. email), or a verbal statement or conduct which clearly indicates in this context your acceptance of the proposed processing of your personal data. Silence, pre-ticked boxes or inactivity will not constitute consent.

Participants aged 13 or over can provide their own consent. All Change may ask for verification of age. If you are under this age All Change needs to get consent from whoever holds parental responsibility for you - unless the offer is an online preventive or counselling service. All Change will make reasonable efforts to verify that the person giving consent for a child does, in fact, hold parental responsibility.

In some situations the legal basis under which All Change processes your data is LEGAL OBLIGATION. For example:

- to record the number and location of people in a building to ensure the safety and security of all building users
- to keep records of accidents, injuries and near misses, to comply with health and safety legislation
- to keep records of financial transactions.

In rare situations the legal basis under which All Change processes your data is VITAL INTEREST. For example:

- personal data may be processed on the basis that it is necessary to protect your "vital interests" or those of another individual (this essentially only applies in *life-or-death* scenarios).

## **Sharing information**

In some instances where the public interest served outweighs the personal interest served by protecting confidentiality - for example, where a serious crime may be prevented, personal information may be shared with appropriate organisations external to All Change e.g. the police.

When following All Change's Safeguarding Procedures for young people and vulnerable adults in some instances it may be necessary to share personal information with appropriate organisations external to All Change e.g. Islington Council's LADO (local authority designated officer), Islington Council Social Services, the police.

All Change will never share, sell, rent or trade your personal information to any third parties for marketing purposes without your prior consent.

We may also receive your personal information from third parties in the following instance:

Where we have partnered with a third-party organisation or service provider to ask you to fill in a booking form with personal details e.g. your payment details to purchase tickets on Eventbrite. In these cases, we use third-parties organisations or service providers that comply strictly with data protection laws, for example around security of personal data. We shall only use this data for contacting you about the relevant activity for which you have shared your contact details. For example, we may contact you by the email address you used to book an All Change event on Eventbrite in order to send you information about that event and any similar future event(s).

## **Your rights**

You have the right to refuse consent or to withdraw consent at a later date. Some information about you, however, is essential for All Change to carry out its business, for instance we need to hold your name and contact information to work and communicate with you.

You have the right to know how we use your information, the right to change your mind about allowing us to use your information and the right to ask that your information is updated or deleted (if there is no legal reason for it being kept).

All Change will deal courteously and promptly (within one month) with any request you make to see the personal information we hold on you. We shall provide the information to you in a permanent form (hard copy).

## **Data Storage, Security and Removal**

Information and records relating to you will be stored securely and will only be accessible to authorised personnel.

A record of any donation(s) you make is stored together with your personal information including your contact preferences.

Information held for other purposes will be stored only as long as it is needed and will be disposed of safely such that the data is irrecoverable.

In situations where we anonymise your personal data, so that it can no longer be associated with you, for research, reporting or statistical purposes, we may use this information indefinitely without further notice to you.

Your information will only be transferred to countries outside the European Economic Area (EEA) if any of the computer servers used to host the website or data backed up in cloud services are located in a country outside of the EEA. If ever this occurs we shall do our best to ensure a similar degree of data security by only transferring data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Despite all precautions, no electronic data transmission is 100% secure.

### **Maintaining your personal data**

All Change has an obligation to ensure the data held about you is correct. If your personal details change, please inform us via [info@allchangearts.org](mailto:info@allchangearts.org)

### **Complaints**

If you think we have made a mistake or you are unhappy about the way we have processed your information you have the right to make a complaint. Please contact All Change in the first instance. If you are not happy with our response, you can get in touch with the Information Commissioner's Office (ICO) to investigate your complaint: <https://ico.org.uk/concerns/>

### **Review**

All Change will regularly review and audit the ways we hold, manage and use personal information. We shall regularly assess and evaluate our methods and performance in relation to handling personal information.

This policy will be updated as necessary to reflect best practice in data management and to ensure compliance with any changes or amendments made to GDPR 2018.

### **All Change 2019**



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## **All Change Privacy Policy for Participants**

All Change is committed to protecting your personal information and being transparent about what information we hold about you. The purpose of this policy is to explain how we collect and use the information we collect from you.

We use your information in accordance with all applicable laws concerning the protection of personal information. This policy is intended to provide you with relevant information including:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it

All Change is the data controller of your personal information. If you have any questions about any aspect of this privacy policy, please contact All Change's Artistic Director using the details below.

### **Who we are**

All Change Arts Limited (All Change) is a company and charity registered in England and Wales (Company number: 1964724, Charity number: 293972).

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### **Information Collection**

All Change will only collect information that you give to us. If you also interact with us as an audience member or donor please also read our Audiences and Donors Privacy Policy.

The information you give us may include information such as name and address, and your date of birth. We may also ask for sensitive personal data, recognised in data protection law as information about your health, race, religious belief, etc. If we collect sensitive data we shall take additional precautions to anonymise the data for any processing which takes place (for example as part of our reporting requirements to funding bodies).

When you take part in one of our projects, we may take photographs of the group or of individuals that may be used for several different purposes, including project creative outcomes, profile, publicity and marketing, reporting and archiving. Your permission will be requested using a media consent form, and if it is not given, identifiable pictures of you will not be used. If someone you are legally responsible for (e.g. a child) is the subject of photographs, we may ask you to give permission on their behalf.

### **The purpose of processing your data**

All Change collects and processes personal information to enable us to deliver our participatory arts projects and programmes. Looking after the personal information you provide and respecting your rights to privacy are very important to us. We shall make every effort to ensure that your personal information is secure and guard it against unauthorised access and loss.

All Change only collects information from you as a participant that we need to carry out our business. We need personal details from you in order to fulfill our obligations to you. This includes providing you with information about the organisation, and your interaction with us on projects, at events and may also extend to understanding how best to support you to participate in our activities.

### **Legal basis**

The lawful basis under which All Change processes your data is usually CONSENT. All Change must ensure you actively opt in to data collection so your explicit consent will be obtained before your data is collected, used and stored. Consent must be given by a clear affirmative act such as a written statement, including by electronic means (e.g. email), or a verbal statement or conduct which clearly indicates in this context your acceptance of the proposed processing of your personal data. Silence, pre-ticked boxes or inactivity will not constitute consent.

Participants aged 13 or over can provide their own consent. All Change may ask for verification of age. If you are under this age All Change needs to get consent from whoever holds parental responsibility for you - unless the offer is an online preventive or counselling service. All Change will make reasonable efforts to verify that the person giving consent for a child does, in fact, hold parental responsibility.

In some situations the legal basis under which All Change processes your data is LEGAL OBLIGATION. For example:

- to record the number and location of people in a building to ensure the safety and security of all building users
- to keep records of accidents, injuries and near misses, to comply with health and safety legislation
- to keep records of financial transactions.

In rare situations the legal basis under which All Change processes your data is VITAL

INTEREST. For example:

- personal data may be processed on the basis that it is necessary to protect your "vital interests" or those of another individual (this essentially only applies in *life-or-death* scenarios).

## **Sharing information**

All personal data is anonymised for All Change's reporting to third parties e.g. funding bodies - except for Integrated Youth Support Services (IYSS) reporting to Islington Council. IYSS is an intuitive case management system which provides real-time access to a single, shared view of a young person, helping teams from different youth-related services work together more efficiently.

In some instances where the public interest served outweighs the personal interest served by protecting confidentiality – for example, where a serious crime may be prevented, personal information may be shared with appropriate organisations external to All Change e.g. the police.

When following All Change's Safeguarding Procedures for young people and vulnerable adults, in some instances it may be necessary to share personal information with appropriate organisations external to All Change e.g. Islington Council's LADO (local authority designated officer), Islington Council Social Services, the police.

All Change will never share, sell, rent or trade your personal information to any third parties for marketing purposes without your prior consent.

## **Your rights**

You have the right to refuse consent or to withdraw consent at a later date. Some information about you, however, is essential for All Change to carry out its project work, for instance we need to hold your name and contact information to work and communicate with you. In most cases, if you will not consent to give us this essential information then you will not be able to take part in All Change's work. Some information is optional and we make this clear on our monitoring forms by giving you a "prefer not to say" option.

You have the right to know how we use your information, the right to change your mind about allowing us to use your information and the right to ask that your information is updated or deleted (if there is no legal reason for it being kept).

All Change will deal courteously and promptly (within one month) with any request you make to see the personal information we hold on you. We shall provide the information to you in a permanent form (hard copy).

## **Data Storage, Security and Removal**

Information and records relating to you will be stored securely and will only be accessible to authorised personnel.

Your information will be stored only as long as it is needed and will be disposed of safely such that the data is irrecoverable.



In situations where we anonymise your personal data, so that it can no longer be associated with you, for research, reporting or statistical purposes, we may use this information indefinitely without further notice to you.

Your information will only be transferred to countries outside the European Economic Area (EEA) if any of the computer servers used to host the website or data backed up in cloud services are located in a country outside of the EEA. If ever this occurs we shall do our best to ensure a similar degree of data security by only transferring data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Despite all precautions, no electronic data transmission is 100% secure. We therefore cannot guarantee the security of information disclosed to us and participants share information at their own risk.

### **Maintaining your personal data**

All Change has an obligation to ensure the data held about you is correct. If your personal details change, please inform us via [info@allchangearts.org](mailto:info@allchangearts.org)

### **Website Privacy**

To view privacy information concerning the use of All Change's website [www.allchangearts.org](http://www.allchangearts.org), analytics, cookies and fonts please use the link on the website.

### **Complaints**

If you think we have made a mistake or you are unhappy about the way we have processed your information you have the right to make a complaint. Please contact All Change in the first instance. If you are not happy with our response, you can get in touch with the Information Commissioner's Office (ICO) to investigate your complaint: <https://ico.org.uk/concerns/>

### **Review**

All Change will regularly review and audit the ways we hold, manage and use personal information. We shall regularly assess and evaluate our methods and performance in relation to handling personal information.

This policy will be updated as necessary to reflect best practice in data management and to ensure compliance with any changes or amendments made to GDPR 2018.

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2019