

# Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your Personal Information. It also explains your rights in relation to your Personal Information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain Personal Information about you. When we do so we are subject to data protection laws applicable in the United Kingdom and we are responsible as 'controller' of that Personal Information for the purposes of those laws.

## Key Terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	The Royal Burgh of Crail Festival Society, a registered charity in Scotland with registered address 31 Castle Street, Crail, Anstruther, Fife, KY10 3SJ (registered charity number SC020929)
Our data protection officer	Geoffrey Robinson
Personal Information	Any information relating to an identified or identifiable individual

## Personal information we collect about you

We may collect the following Personal Information about you:

- Your name and address details detail, email address and telephone number and any details you submit in forms
- Information about how you use our website.

This Personal Information is required to inform you about the services we can provide to you.

The provision of the information named above is required from you to enable us to provide our services to you. We will inform you at the point of collecting information from you whether you are required to provide the information to us.

## **How your personal information is collected**

We collect most of this Personal Information directly from you when you sign up for our email service via our website and apps. However, we may also collect information:

- directly from a third party, e.g. our ticketing provider (TicketSource) and medical services provider (Fife Medical Group);
- from a third party with your consent, e.g. our ticketing provider (TicketSource);
- from cookies on our website—for more information on our use of cookies and how to disable them, please see our Cookies Policy; and
- via CCTV systems.

If you are involved in an incident or accident while attend a Crail Festival event, where it has been necessary to provide you with medical services, Fife Medical Group may provide us with Personal Information concerning your health and medical treatment you receive while at the event.

## **How and why we use your Personal Information**

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so. In order to use your personal information, we rely on the following legal bases:

- you have given consent to the processing of your personal data for one of more specific purposes;

- processing is necessary for the performance of the services we provide to you;
- processing is necessary to protect the vital interests of the data subject or of another natural person; and
- processing is necessary for the purposes of the provision of health treatment.

We collect and process your personal information:

- to provide information to you about events you have booked to attend;
- to track website usage and improve our website;
- to ensure safety at our events;
- for market research and statistical analysis and to analyse the use of our services so that we can improve them;
- for direct marketing purposes (in accordance with applicable data protection laws); and
- to allow analysis and advertising —for more information on our use of cookies and how to disable them, please see our Cookies Policy

## **Marketing - Opt In**

No Personal Information provided by you will be used for marketing purposes unless you provide consent when completing a booking (via TicketSource) or when signing up to our email service. If you provide consent then we may at times share your information with relevant third parties (described below).

If we provide a one-off form at the Crail Festival for use of signing you up to a specific email list/preference then we will provide accurate terms and conditions for sign up at that point. Please read through these before submitting your information.

## **Marketing - Opt Out**

You can unsubscribe from receiving marketing emails from us at any time by following the unsubscribe link on the bottom of the e-mail you receive.

## **Who we share your Personal Information with**

We routinely share Personal Information with:

- facets within the [The Royal Burgh of Crail Festival Society]
- third parties we use to help deliver our products and/or services to you, e.g. payment service providers;
- other third parties we use to help us run our business, e.g. website hosts;
- third parties approved by you; and
- our insurers and brokers.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Information to provide services to us and to you. We may also share Personal Information with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations, or other authorised bodies where permitted or required by law.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may

not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your Personal Information with any other third party.

## **How long your personal information will be kept**

We will keep your Personal Information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law; and
- to inform you of similar events, offers and promotions (in accordance with applicable data protection laws).

We will not retain your Personal Information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of Personal Information. If you would like further details regarding the applicable retention period(s) which apply to your data, please contact us (see our contact information below).

When it is no longer necessary to retain your Personal Information, we will delete or anonymise it.

## **Transferring your personal information out of the EEA**

To deliver services to you, it is sometimes necessary for us to share your Personal Information outside the European Economic Area (EEA), for example:

- with our service providers located outside the EEA;
- if you are based outside the EEA.

Such countries do not have the same data protection laws as the United Kingdom and EEA. Any transfer of your personal information will be

subject to appropriate or suitable relevant safeguards. If you would like further information regarding the mechanisms used to comply with data protection laws when transferring your personal information out of the EEA, or to obtain a copy of the safeguards, please contact us (see our contact information below).

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your Personal Information (the right of access)
Rectification	The right to require us to correct any mistakes in your Personal Information
To be forgotten	The right to require us to delete your Personal Information—in certain situations
Restriction of processing	The right to require us to restrict processing of your Personal Information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  - at any time to your Personal Information being processed for

	<p>direct marketing (including profiling);</p> <p>-in certain other situations to our continued processing of your Personal Information, e.g. processing carried out for the purpose of our legitimate interests</p>
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the [UK Information Commissioner’s Office \(ICO\)](#) on individuals’ rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us OR our Data Protection Officer]—see below: ‘How to contact us’; and
- let us have enough information to identify you (e.g. your full name, address and customer or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## Keeping your personal information secure

We have appropriate security measures to prevent Personal Information from being accidentally lost, or used or accessed unlawfully. We limit

access to your Personal Information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Nevertheless, the Internet is not completely secure. We encourage you to use caution which includes not sharing your passwords with others.

## **Film & Photography at Crail Festival Society events**

In order to promote the Crail Festival and the events hosted here, we often need to take film and photography across our live entertainment and events. To capture the essence of these events, we sometimes look to include the people who attend our events.

A photograph or footage of you in a film is your personal information and belongs to you. Therefore no business can use your image to promote it's business without your consent.

At each entrance point to every event, there is a sign which outlines that photography or filming is taking place in the building. When we have photographers or filmmakers working at the event on our or our clients behalf it is their responsibility to seek your permission for your image to be captured for film or photography for future marketing usage by the Crail Festival or Crail Festival partners. This is only if you will be recognised in a given photograph or film. The exception to this is when you might be in a large crowd or group and therefore unrecognisable.

When there are children or a child in the photograph or film, the same rules apply as before – however it is necessary to seek written permission from their parent or guardian if they are under 12 years old. And for the photographer or filmmaker to also ensure that the child is comfortable with their image being taken.



## **Competition Entries**

Only one entry per person per Competition is allowed (except where the Competition Notice states that more than one entry can be submitted) and any entrant who enters more than the permitted maximum will be disqualified.

Competition entries must be made in the manner and by the closing date specified on the Competition Notice. Failure to do so will disqualify the entry.

Proof of posting or emailing cannot be accepted as proof of delivery. Crail Festival Society cannot accept responsibility for any lost or undelivered entries/posts.

## **Prizes**

Prize winners will be chosen at random, unless specified otherwise in the Competition Notice, from all qualifying Entries.

In all matters, the decision of Crail Festival Society shall be final and no correspondence or discussion shall be entered into.

Prize winners will be notified in the manner and within the time specified on the Competition Notice.

Competition winner(s) names may be published on the [CRAILFESTIVAL.ORG](http://CRAILFESTIVAL.ORG) website.

Prizes are non-transferable and there is no cash alternative.

## **Publicity**

Winners may be requested to take part in promotional activity and Crail Festival Society reserves the right to use the names and addresses of winners in any publicity.

Data relating to entrants will be retained by Crail Festival Society and for a reasonable period after the Competition closes to assist Crail Festival Society to operate competitions in a consistent manner and to deal with any queries on the Competition.

## **Links**

The site contains links to other web sites and we are not responsible for the privacy practices or the content of such web sites or for the privacy policies and practices of other third parties. Please review their policies if you want to find out more.

## **How to complain**

We hope that we or our Data Protection Officers can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone:0303 123 1113.

## **How to contact us**

Please contact us and/or our Data Protection Officer by email if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Crail Festival Society  
31 Castle Street  
Crail  
KY10 3SJ

Our Data Protection Officer's contact details:

[DataProtectionOffice@crailfestival.org](mailto:DataProtectionOffice@crailfestival.org)

## **Changes to this privacy policy**

This privacy notice was published on 25 June 2022 and last updated on 11 July 2022.

We may change the wording of this privacy policy from time to time as our business requirements or the law changes. Any changes to this privacy notice will be updated on our website

<https://www.crailfestival.org/>