

Privacy Statement for the Western Region Audiovisual Producers Fund

The Western Region Audiovisual Producers Fund (WRAP) is committed to protecting and respecting your privacy.

This Privacy Statement will let you know how we look after your personal data with regard to your use of this website and in the context of receiving marketing communications from us. It also informs you as to our obligations and your rights under data protection law. Below is further information on how we collect and process personal data in connection with use of this website and for marketing purposes.

1. Who is responsible for your personal data?

For the purposes of the EU General Data Protection Regulation (EU Regulation 679/2016) (the “**GDPR**”), WRAP is the data controller with regard to the personal data described in this Privacy Statement.

“**Data controllers**” are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed.

The WRAP Development Manager will monitor compliance with our data protection obligations and with this Privacy Statement and related policies. If you have any questions about this policy or about our data protection compliance please [contact us](#).

2. What personal data do we collect?

“**Personal data**” means any information relating to an identified or identifiable natural person.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes correspondence address and any billing address, email address and telephone numbers used professionally.
- **Financial Data** includes bank account and tax clearance details.
- **Career Data** includes relevant education and past work experience.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

3. How do we collect your personal data?

We collect your personal data as follows:

- **Direct interactions.** You may give us your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - make an enquiry with regard to our services
 - register on our website;
 - make an application, either on-line or on hard copy;
 - enter into a contract with us;
 - request payment for services provided;
 - leave a message with a member of our staff;
 - submit an FOI or Data Access Request application;
 - request marketing to be sent to you; or
 - sign up to our newsletter.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy here for further details.
- **Third parties or publicly available sources.** We may receive personal data about you, (your IP Address only) from analytics providers such as Google based outside the EU;
- **Identity and Contact Data** from publicly available sources.

4. For what purposes do we process your personal data and what is our legal basis?

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing
To enter you onto our mailing lists where you have requested to be added	(a) Identity (b) Contact (c) Marketing and Communications	Consent
To process your applications, contracts and payments	(a) Identity (b) Contact (c) Financial	Consent Processing is necessary for the performance of a contract
To manage our relationship with you which will include:	(a) Identity (b) Contact	Consent

(a) Notifying you about changes to our terms or privacy policy (b) Asking you to provide feedback or take a survey	(c) Profile (d) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Consent
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Consent

Where we rely on consent as a legal basis, you may withdraw consent at any time by [contacting us](#).

Withdrawal of consent shall be without effect to the lawfulness of processing based on consent before its withdrawal.

We use cookies to facilitate the use of our website. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy [here](#).

5. Do we share your personal data with anyone else?

We may share your personal data with the following parties in connection with our processing of your personal data:

Third party	Reason for sharing data
Backup Provider	We store our document management system on a local server. The encrypted backups are held off site.
External Readers, Assessors & Production Companies	The service providers are necessary to facilitate, where required, the assessment of projects. Others may be seeking information for local crew for productions in the area.

Western Development Commission, other Competent Authorities, including authorities regulating us	To comply with legal or regulatory obligations or requests
Service providers handing your information on our behalf	To provide essential services and to fulfil contractual arrangements in providing our services.
Email service provider	The service provider allows us to send you email communications and alerts us if you request to be removed from our mailing lists as well as allowing users to update and control their preferences.

We require all third parties to enter into a data processing agreement with us which complies with our obligations under the GDPR. This agreement requires third parties to have appropriate security systems in place and only to use your personal data on our instructions and in accordance with data protection law.

6. Keeping your personal data secure

We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We limit access to your personal data to those employees, agents and other third parties who are required to have access to your personal data and where they have agreed that they are subject to a duty of confidentiality.

We have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We have procedures in place to deal with actual and suspected data breaches which include an obligation on us to notify the supervisory authority and/or you, the data subject, where legally required to do so.

We may transfer your personal data outside of the European Economic Area but will always ensure that appropriate safeguards are in place such as:

- (a) the European Commission has issued a decision confirming that the country to which we transfer the personal data ensures an adequate level of protection for the data subjects' rights and freedoms;
- (b) appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the European Commission, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the DPO;
- (c) the data subject has provided explicit consent to the proposed transfer after being informed of any potential risks; or
- (d) the personal data is being transferred to a company in the US which has self-certified its compliance with the EU-US Privacy Shield which has been found by the European Commission to provide an adequate level of protection to the personal data of EU citizens.

7. For how long do we keep your personal data?

Your personal data will be deleted when it is no longer reasonably required for the purposes described [above](#) or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data.

Where you ask to be unsubscribed from marketing communications we may keep a record of your email address and the fact that you have unsubscribed to ensure that you are not sent any further emails in the future.

Further details on how long we retain your personal data are contained in our retention policy which you can request from us by [contacting us](#).

8. Your data protection rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold your personal data, and, if so, what that personal data is and why we are holding/using it.
- **Request access** to your personal data (commonly known as a "**data subject access request**"). This enables you to receive a copy of your personal data that we hold and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data that we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer of your personal data** in an electronic and structured form to you or to another party (commonly known as a right to "**data portability**"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

In the event that you wish to make a complaint about how your personal data is being processed by WRAP, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority who can be contacted as follows:

Contact	Data Protection Commissioner
Telephone	+353 57 8684800/+353 761 104 800
Email	info@dataprotection.ie

Post	Office of the Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois
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9. Contact us

You can contact us with any queries, complaints or requests to exercise your data protection rights using the details below:

Contact:	Sarah Dillon
Telephone	091 454 993
Email	wrap@galwayfilmcentre.ie
Post	WRAP Fund C/O Galway Film Centre Cluain Mhuire Wellpark Road Galway

10. Updates to this Privacy Statement

Our Privacy Statement may change from time to time, and any changes to this Privacy Statement will be posted on the website and will be effective when posted. As your use of WRAP website is subject to your acceptance of this Privacy Statement, and any amendments thereto, please check back regularly.

Date: 2020