

PRIVACY NOTICE

NEWLYN ART GALLERY & THE EXCHANGE

Newlyn Art Gallery & The Exchange cares about its long-term relationships with all visitors, participants and supporters and under the General Data Protection Regulation (GDPR) we have a legal duty to treat your data lawfully, fairly and transparently.

We will protect any personal data we collect from you, be explicit about what purposes we are using it for and make it easy for you to be in charge of your own data.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

Personal data refers to any information relating to a person who can be directly or indirectly identified in particular by it.

We may collect name, address and postcode, email address or phone number, and in the case of financial transactions, bank and payment card details, purchase details and record of donations.

We collect personal information you have given us when you:

- sign up to our email bulletin; complete visitor surveys; participate in competitions; offer feedback or comments;
- make a donation; allow us to claim Gift Aid; subscribe to become a Gallery Supporter or Patron; purchase items from our ebay shop or art work from the Gallery; join our Student or Collaborators groups or sign up to participate in events or buy tickets;
- become a gallery Volunteer; apply for a residency, a job or other opportunity; become an employee or contractor.

We also collect information about your interactions with us:

Depending on your settings or the privacy policies for social media and messaging services, you might give us permission to access information from those accounts or services. When we send you a mailing, we keep a record of this, and in the case of emails, we keep a record of which you have opened or links you have clicked on.

We use cookies on our site to collect data about how visitors use the site, for example, Google Analytics. The data that is collected is anonymous and in no way can be used to identify individuals. This data helps us review visitor traffic and to provide a better service for our visitors. To find out more about cookies visit <http://www.aboutcookies.org>

DIGITAL MARKETING

Newlyn Art Gallery & The Exchange (Newlyn Art Gallery Ltd), may use marketing services to advertise on third party websites after you have visited our webpage. We, and our third-party vendors such as Google and Meta, use cookies to inform, optimise and serve ads based on your past visits to our website.

- **GOOGLE ADWORDS:** Google AdWords service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the My Ad Settings page: <https://www.google.com/settings/ads>. Google Analytics Opt-out browser add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>
- **META:** From time to time, we may use Meta remarketing service provided by Meta Platforms, Inc. You can learn more about interest-based advertising, and how ads are shown to you via Meta by visiting this page: <https://www.facebook.com/ads/about>. To opt-out from Facebook's interest-based ads follow these instructions on the web page here: https://accountscenter.facebook.com/ad_preferences. Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. For more information on Meta's privacy practices, please visit Meta's Privacy Policy: <https://www.facebook.com/privacy/policy/>.
- **TRACKING:** From time to time, we use various tracking tools such as Google Tag Manager and Meta Pixel.
 - **GOOGLE TAG MANAGER:** To monitor and provide diagnostics about system stability, performance, and installation quality, Google Tag Manager may collect some aggregated data about tag firing. This data does not include user IP addresses or any measurement identifiers associated with a particular individual. Other than data in standard HTTP request logs, all of which is deleted within 14 days of being received, and diagnostics data noted above, Google Tag Manager does not collect, retain, or share any information about visitors to our customers' properties, including page URLs visited. Learn more about our use of Google Tag Manager data in their [terms of service](#).
 - **META PIXEL:** The Meta Pixel receives these types of data:
 - HTTP Headers** – Anything that is generally present in HTTP headers, a standard web protocol sent between any browser request and any server on the internet. This information may include data such as IP addresses, information about the web browser, page location, document, referrer and person using the website.
 - PIXEL-SPECIFIC DATA** – Includes Pixel ID and the Facebook Cookie.
 - BUTTON CLICK DATA** – Includes any buttons clicked by site visitors, the labels of those buttons and any pages visited as a result of the button clicks.
 - OPTIONAL VALUES** – Developers and marketers can optionally choose to send additional information about the visit through conversion tracking. Examples of custom data events are conversion value, page type, and more.

FORM FIELD NAMES – Includes website field names such as or including 'email', 'address', 'quantity' when you purchase a product or service. We don't capture field values unless you include them as part of Advanced Matching, or conversion tracking.

Please see how Meta Pixel is GDPR compliant here:

<https://developers.facebook.com/docs/meta-pixel/implementation/gdpr/>

WHY AND HOW DOES NEWLYN ART GALLERY & THE EXCHANGE USE THIS PERSONAL INFORMATION

There are three legal bases under which we will process your data:

- **Contract purposes** – for instance, when you make a purchase or a donation, you are entering a contract with us. In order to perform the contract, we need to store and process your information, for example, we may need to keep your email to check the arrival of posted item.
- **Legitimate interest** – in certain situations, we may collect your information for purposes that are in the business interests of the gallery or you. For example, if you are an artist who uses a personal email address, we may keep it in order to contact you professionally.
- **With your consent** – for any situation where the two bases above are not appropriate, we will ask for your explicit consent before collecting that information.

Newlyn Art Gallery & The Exchange is a registered charity which relies on its supporters to help spread the word about its work, help it get better at what it does and to support the gallery by giving time or financial support. With your consent, we may use the information you provide to:

- Contact you about forthcoming programming, events or services we think may be of interest to you
- Inform our future programming, improve our service and occasionally report to stakeholders, like funders, as required. In this instance, data is anonymised.
- If you consent, we will let you know about our fundraising activities.
- Understand the background of those who support us.

We will not share your personal data with external companies or bodies other than those selected or statutorily required to process our customers' details, including:

WHO

HMRC
Charity Checkout
Eventbrite
Arts Council England
Mail Poet
Sage

WHY

Processing Gift Aid submissions
Processing donations and subscriptions received
Processing ticket purchases
Funding requirements.*
Managing email communication
Processing of invoices

To understand the background of those who support us, we may compile additional information about you that is publically available, for example, listed Directorships.

HOW WILL WE PROTECT YOUR PERSONAL DATA

We will never sell your personal data, and we will not provide your personal data to another body for their marketing purposes without your explicit consent.

We will not hold unnecessary information about you and we will only hold necessary data on record for a set period in line with our Retention Schedule, for example, gift aid information should be held for 6 years.

We will do our best to protect your personal data by the use of network protection and encryption and physical security such as locked drop boxes and cabinets.

You have a right to request a copy of the data we hold about you. You may ask us to correct or remove data. It is your right to opt out at any time by using the unsubscribe option at the foot of every email bulletin, or by contacting us via the contact details below. We undertake to act on your request within one month of receipt.

We will keep our privacy policy under regular review and will place updates on this web page. You may request a printed copy.

UPDATED: OCT 2024

HOW TO CONTACT US

Please contact us if you have questions about our privacy policy or information we hold about you by emailing info@newlynartgallery.co.uk or by writing to Newlyn Art Gallery & The Exchange, Princes Street, Penzance, TR18 2NL, or by telephone: 01736 363715. If your question has not been answered satisfactorily, you should refer to [The Information Commissioner's Office](#)

Newlyn Art Gallery Ltd is a Registered Charity [273785] and Limited Company [No 1310070]



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FOYLE FOUNDATION