

Privacy Policy

Welcome to Ingra Tor Studios' privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website, www.ingratorstudios.co.uk, (regardless of where you visit it from) or when you request a place at our residency and tell you about your privacy rights and how the law protects you.

This privacy policy aims to give you information on how we collect and process data through your use of our website (or when you phone us), including any data you may provide when you contact us through our online form or apply for a place at our residency.

1 WHO WE ARE

Ingra Tor LLP is the controller and responsible for your personal data (referred to as **"Ingra Tor Studios"**, **"we"**, **"us"** or **"our"** in this privacy policy).

Ingra Tor Studios is a working artist studios set within Dartmoor National Park, offering artist residencies.

If you have any questions about this privacy notice or our data protection practices, including any requests to exercise your legal rights, please contact us using the details provided, as follows:

Contact Details	
Full name of legal entity:	Ingra Tor LLP (trading as Ingra Tor Studios)
Company number:	OC431199
Email address:	www.ingratorstudios.co.uk
Postal address:	Routrundle Sampford Spiney Yelverton Devon PL20 6LL
Telephone number:	+44 (0)7471 189 813 / +44 (0)7880 033 153

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2 IMPORTANT INFORMATION

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Our website is not intended for children and we do not knowingly collect data relating to children.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or data relating to a corporate entity.

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data:** your first name, last name and title.
- **Contact Data:** your address, email address and telephone number(s).
- **Transaction Data:** details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** internet protocol (IP) address, 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.
- **Marketing and Communications Data:** your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4 IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, confirming your place at our residency). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

5 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- 5.1 **Direct interactions.** You may give us your Identity, Contact and Marketing and Communications Data by filling in forms on our website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for a place at our residency; or
 - give us feedback or contact us.
- 5.2 **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.

6 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances, where it is necessary:

- to perform the contract we are about to enter into or have entered into with you;
- for our legitimate interests and your interests and fundamental rights do not override those interests; or
- to comply with a legal or regulatory obligation.

The types of lawful basis that we will rely on are:

- **Consent** means agreement which must be freely given, specific, informed and be an unambiguous indication of your wishes by which you, by a statement or by a clear positive action, signify agreement to the processing of personal data relating to you.
- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide our residency services and maintain records of stays	Identity Contact	Performance of a contract with you Necessary for our legitimate interests (to provide the residency services) Necessary to comply with a legal obligation

To process your place at our residency including to manage payments, fees and charges and to collect and recover money owed to us	Identity Contact Transaction	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you or our client which may include notifying you about changes to our terms or privacy policy	Identity Contact Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated)
To make suggestions and recommendations to you about services that may be of interest to you	Identity Contact Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) Necessary to comply with a legal obligation

6.1 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- Unsubscribe link displayed on every marketing communication
- Clear directions on the website to enable you to change your preferences

You will receive marketing communications from us if you have applied for a place at our residency and you have not opted out of receiving that marketing (or if you have requested information from us, if you have provided us with your consent).

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

We will not share your personal data with any third parties.

6.2 Cookies

Our website use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website, allows us to improve our website and maintain security. By continuing to browse the website, users are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of

your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

We use the following cookies:

Cookie	Purpose	Expiration
ssr-caching	Indicates how a site was rendered.	1 minute
hs	Used for security purposes.	Session
svSession	Used to distinguish users.	2 years
XSRF-TOKEN	Used for security purposes.	Session

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Except for essential cookies, all cookies will expire as outlined under the expiration column in the table above.

6.3 Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 DISCLOSURES OF YOUR PERSONAL DATA

For the purposes set out in section 6, we may have to share your personal data with the following parties:

7.1 External Third Parties such as:

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

7.2 **Specific Third Parties** such as:

- **Wix.com:** Based in Israel, Wix.com provide us with cloud-based web development services.

7.3 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

7.4 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8 **INTERNATIONAL TRANSFERS**

Our external third party providers may be based outside the European Union (**EU**) so their processing of your personal data will involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

9 **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

10 **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

We will generally retain individuals' data for a period of six years after they have accepted a place at our residency, to ensure that we are able to assist them should they have any questions or feedback in relation to the services, for tax purposes, or to protect, or defend our legal rights.

Where we process your personal data for the purposes of marketing communications, we will keep your Identity and Contact data until you opt out of such marketing. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our marketing lists.

Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with services), we will retain your data for twelve months.

In some circumstances you can ask us to delete your data: see section 11 below for further information.

11 YOUR LEGAL RIGHTS

11.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are detailed below:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you 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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-

readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You also have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk).

If you wish to exercise any of the rights set out above, please contact us.

11.2 **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

11.3 **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.4 **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.