



## Irish Writers Centre Privacy Policy

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### 1. Introduction

The Irish Writers Centre values the trust of all its members and customers. As an organisation we are committed to upholding the standards of privacy outlined within current relevant legislation, namely the Irish Data Protection Act (2018) and the General Data Protection Regulation (2018). As such, any information collected by the Irish Writers Centre is used to provide better services and resources to individuals visiting our centre and website. In this Privacy Policy, you can read about how and why we collect and store information, the legal basis behind it, and the various third-party service providers your information might be shared with.

### 2. What is Personal Data?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the EU General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018.

### 3. Who are we?

The Irish Writers Centre is the data controller. This means it determines how your personal data is processed and for what purposes.

### 4. How do we process your personal data?

In the course of its organisational activities, the Irish Writers Centre acquires, processes and stores personal data in relation to:

- Irish Writers Centre employees and members of our Board of Directors
- Our customers and users, or prospective users, of our services
- Third party service providers engaged in the course of our work
- Third party individuals interacting with, working with or associated with the Irish Writers Centre

The Irish Writers Centre complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To communicate with you as needed in order to deliver our services
- To ensure that applicants meet the eligibility requirements for the schemes for which they apply
- To comply with legal, accounting and other regulatory requirements
- For all other relevant purposes

### Types of data we collect

#### Personal data

When you sign up for an Irish Writers Centre course or apply to one of our programmes, we request the following personal data which is then stored within our filing system:

- Your name
- Your email address
- Your phone number
- Your postal address

If you book a place on one of our courses, we may provide course facilitators with your name and email address so that they can provide you with materials for the duration of your course. Facilitators are not permitted to use your information for any other purpose unless permission has been given by you.

We may contact you regarding your experience of Irish Writers Centre services after a course or programme has finished. This feedback and information is used to improve our services and is never passed on to other organisations.

Applications for some of our programmes are collected via third-party service providers such as **Submittable** and **Google Forms**. The personal data collected via these services and made available to the Irish Writers Centre includes your name, email, phone number, and home address. Once received, this information is stored on the Irish Writers Centre database and is deleted in accordance with the IWC records retention policy outlined below. The Irish Writers Centre database is securely monitored by the IT Support and Services Company, **Spector**. For more information about Spector's role in keeping your data safe, view our Cyber Security Policy. To read more about Submittable and its policies see Submittable's [Submitter Terms of Service](#). To read more about Google Forms and its policies see [Google's Terms of Service](#).

We will never share your personal details with any other companies without your consent.

### **Special Category Data**

The Irish Writers Centre will occasionally request information from its customers and users that falls under 'special' categories. The Data Protection Commission of Ireland defines these categories as:

- Personal data revealing racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data and biometric data processed for the purpose of uniquely identifying a natural person.
- Data concerning health.
- Data concerning a natural person's sex life or sexual orientation.

This information will only ever be requested in order to evaluate an applicant's eligibility for certain IWC programmes and will be offered by the applicant on a voluntary basis. Once received, this data is stored safely within the Irish Writers Centre database and is deleted in accordance with the IWC records retention policy outlined below.

### **Purchasing and Payment Data**

When you make a purchase or donation through the Irish Writers Centre office or website your name, postal address, email address and phone number will be stored in our filing systems. When you make a payment through our website, your personal data will also be shared with the organisations that provide our website's functionality, as necessary for the provision of our services.

The Irish Writers Centre website is hosted by **Maxer Host Ltd**. Ongoing technical support is provided by our website's developers, the **Hillside Agency**, who may access your personal data in the course of providing us with this support. The online ecommerce platform that allows us to sell our courses and services via our website is **WooCommerce**, a product of **Automattic Inc.**, and the payment gateway providers for payments through our website are **Stripe** and **PayPal**.

In addition to the data outlined above, when processing payments made through the website, WooCommerce will also provide us with a note about the payment method you have used, including the last four digits of your credit or debit card number where applicable. This data is stored in Maxer Host Ltd's database, and is deleted in line with the records retention policy outlined below. You can read more about Maxer Host Ltd in its [Privacy Policy](#).

Your full credit card details are never stored on our website. Instead, they are processed via third-party payment gateway providers Stripe and PayPal. You can read more about these third-party service providers via the [Stripe Data Processing Agreement](#) and the [PayPal Privacy Statement](#).

Ticketing for some of our events is managed via **Eventbrite**. The personal data collected by Eventbrite and made available to the Irish Writers Centre includes your name and email, address, and, where applicable, the payment method you have used and the last four digits of your credit or debit card number. Your full billing and payment information is not made available to us, but is instead processed by Eventbrite and its third party payment service providers via Eventbrite Payment Processing, in accordance with Eventbrite's [Terms of Service](#) and [Privacy Policy](#).

### **Mailing List**

As part of the registration process for our weekly e-newsletter, we collect personal information:

- Your First Name
- Your Last Name
- Your Email Address

We use this information for a number of reasons: to inform you about the activities of the Irish Writers Centre; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, **MailChimp**, to deliver our newsletter. When signing up to our newsletter, you give permission to receive emails from the Irish Writers Centre and acknowledge that your information will be transferred to MailChimp for processing. We use MailChimp to gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [MailChimp's Privacy Notice](#). You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our Deputy Director at [management@irishwriterscentre.ie](mailto:management@irishwriterscentre.ie).

### **Website and External Links**

We use cookies so that you can experience the full functionality of our website. You can take a look at [the breakdown of cookies used throughout our site](#) for further information. Some cookies may be set by third parties when you are interacting with content such as YouTube video embeds. When you click on external links, they may direct you away from our website. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

## 5. What is the legal basis for processing your personal data?

The six bases for lawful processing, as outlined within Article 6 of the General Data Protection Regulation (2018), are:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

The processing performed by and on behalf of the Irish Writers Centre falls in all cases under the bases of consent (a), contractual necessity (b) and legitimate interest (f).

## 6. International Transfer

All personal data collected by the Irish Writers Centre is stored within the European Economic Area or countries whose data protection regimes have been designated as adequate by the European Commission.

In the event that we collaborate on an international residency programme with a centre or institution outside the European Economic Area, the Irish Writers Centre will seek the permission of the individual or individuals selected for participation before sharing any of their personal data.

We will not transfer any data to a third country or international organisation without your explicit consent and without appropriate privacy safeguards in place.

## 7. How long do we keep your data?

The default retention period for personal data collected and processed by the Irish Writers Centre is six years from the date of receipt. Retention periods will differ in some cases depending on the class and type of personal data and the requirements set out by the Data Commission of Ireland. The Irish Writers Centre does not maintain data beyond what is absolutely required for its purposes and where is otherwise required by law.

## 8. Your rights and your personal data

You have the following rights with respect to your personal data:

- The right to request a copy of your personal data, which the Irish Writers Centre holds about you
- The right to request that Irish Writers Centre correct any personal data if it is found to be inaccurate, incomplete or out-of-date
- The right to request your personal data is erased where it is no longer necessary or lawful for the Irish Writers Centre to retain such data
- The right to request that the Irish Writers Centre provide you with a copy of your personal data and, in certain circumstances, to transmit that data directly to another data controller
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data
- The right to lodge a complaint with the Data Protection Commission

## 9. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice. The new notice will explain the new use of your personal data prior to commencing the processing. It will set out the relevant purposes and processing conditions.

## 10. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact our Deputy Director at the following location.

Irish Writers Centre  
Address:  
Irish Writers Centre,  
19 Parnell Square,  
Dublin 1,  
D01 E102.

Tel. (+353) 1 872 1302

Email: [management@irishwriterscentre.ie](mailto:management@irishwriterscentre.ie)

Website: [www.irishwriterscentre.ie](http://www.irishwriterscentre.ie)

## 11. Complaints

You have the right to make a complaint to the Data Protection Commission which you can contact by phone: +353 (0761) 104 800; via email [info@dataprotection.ie](mailto:info@dataprotection.ie) or by writing to:

The Data Protection Commissioner,  
Canal House,

Station Road,  
Portarlinton,  
Co. Laois,  
R32 AP23.

### **Changes to this policy**

This policy will be reviewed in January 2024