



**Cruit Éireann**  
**Harp Ireland**

## **Data Protection Policy**

### **1. Introduction**

**Cruit Éireann | Harp Ireland** was established in 2017 by harpers in collaboration with The Arts Council, An Chomhairle Ealaíon to support the continuing evolution of the harp and to address the need for a professional national resource organisation to service the needs of the sector and develop and promote harping generally.

The harp occupies a unique niche in the traditional arts eco-system in Ireland and is an integral part of our national identity. The designation of harping on the UNESCO Intangible Cultural Heritage of Humanities list reflects its critical place at the centre of our living culture.

### **2. Rationale**

Data Protection law safeguards the rights of individuals in relation to the processing of their personal data. Data Protection legislation confers rights on individuals as well as responsibilities on those persons processing personal data. This Policy sets out how CÉHI seeks to process personal data and ensure that staff, board members and the general public understand the rules governing their use of personal data, including obligations in dealing with personal data in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the General Data Protection Regulation (GDPR) 2018, the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003).

### **3. Purpose of this policy**

This policy is a statement of Cruit Éireann | Harp Ireland's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

### **4. Data Protection Principles**

CÉHI is committed to adhering to the principles of, and obtaining and processing data lawfully, fairly and transparently:

- **Purpose Limitation**

CÉHI will collect data for specified, explicit, and legitimate purposes, which will not be further processed incompatibly.

- **Data Minimization**

CÉHI will ensure data is adequate, relevant, and limited to what is necessary.

- **Accuracy**

CÉHI will keep data accurate and up-to-date and rectify inaccuracies without delay.

- **Storage Limitation**

CÉHI will retain data only for as long as necessary for the purposes collected.

- **Integrity and Confidentiality**

CÉHI will implement appropriate security measures to protect data.

- **Accountability**

CÉHI will comply with these principles.

## **5. Rights of Data Subjects**

We ensure individuals can exercise their rights to:

- Access to their data
- Rectify inaccurate data
- Erasure of data
- Restrict processing
- Data portability
- Object to processing

## **6. Policy Statements**

- 1.1. CÉHI will not use the information you provide us with for purposes other than those for which the information was sent. If required to do so in order to comply with legal obligations or duty to disclose, or in order to protect the rights, property or safety of our business, our customers or others, CÉHI may release data.
- 1.2. CÉHI will not sell, share or transfer your information to anyone outside our organisation. This does not include trusted third parties who assist us in

managing our website, or processing ticket or merchandise sales where we are confident that they are compliant with Data Protection legislation.

- 1.3. CÉHI respects the privacy of those who visit our website and those who provide personally identifiable information, our valued customers and members. The privacy commitment to our website users can be viewed through our website's cookie policy (<https://www.harpireland.ie/cookie-policy/>) and our privacy policy (<https://www.harpireland.ie/privacy-policy/>)
- 1.4. Personal Data is otherwise collected by CÉHI when CÉHI service users and contractors voluntarily provide information i.e. registration for e-newsletters, donations, ticket purchase.
- 1.5. CÉHI acknowledges the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights, as set out in this policy. You have the right to obtain a copy of your personal data in accordance with section 4 of the Data Protection Acts 1988 and 2003.
- 1.6. CÉHI will ensure that all digitally retained data held on CÉHI servers is password protected.
- 1.7. CÉHI will ensure that any data held in physical copy will be stored within a secure, lockable location accessible only to CÉHI personnel.

## **7. Responsibilities**

Overall compliance rests with Cruit Éireann | Harp Ireland. The designated person responsible for Data Protection will coordinate compliance efforts, training, and support. However, our responsibility varies depending upon whether we are acting as either a data controller or a data processor. All employees and contractors of Cruit Éireann, Harp Ireland who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts.

## **8. Procedures and Guidelines**

We are committed to best practices and compliance with GDPR, providing guidelines and procedures to ensure data protection.

## **9. Policy Review**

This policy will be reviewed every two years and additionally amended to reflect changes in legislation, industry standards or organisational requirements as necessary. Artists and our core funders will be informed of any significant changes to the policy.

## **10. Contact Information**

For any queries on this policy, please contact CÉHI Chair or CEO at [info@harpireland.ie](mailto:info@harpireland.ie)

