

Evelyn Sorohan

Data Protection Policy

Our processing of your personal data will comply with the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation ("GDPR").

The General Data Protection Regulation (GDPR) requires that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
7. The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

This Statement describes how we use your personal information in our engagements with you.

When you engage in a consultation with Evelyn Sorohan, upto and including the purchase of a product from us, we will be the company responsible for handling your personal information (known as a "data controller" under data protection law).

The personal information collected by us includes your :

- name
- postal address,
- contact information,
- telephone number,
- email address,
- finance information (for order transactions payment processing and only)
- and any other details furnished by you in your relationship with us.

1. The purpose and legal basis for processing your information

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We collect your personal information to enter **into a contract** with you to sell a product from our online store. It is a requirement of the contract that we enter into with you that you provide all personal information requested. If you do not provide us with contact details we may not be able to perform our contract, for example, we will not be able to call you when your order is completed.

In order to process your personal information for this purpose, the processing is necessary for the **performance of a contract** to which you are a party.

We may also use your personal information for direct marketing purposes to make you aware of products and services which may interest you or for customer satisfaction surveys where you have not objected to us doing so. As part of our marketing activities, we may also use your personal information. We may do this by phone, post, email, text or through other digital media. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is to develop relationships with our existing customers and to assess our own service performance and standards.

We may also use your personal information to comply with any obligation under anti-money laundering legislation, for the purposes of any statutory audit or for any other legal obligation to which we are subject.

We may also use your personal information to manage our everyday business needs, including accounting and to prevent fraud. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is in the effective management of our business.

2. Your Information and Third Parties

- Purchases and Payment Processors

If you make a purchase through our online store, you may be able to pay using a third-party payment service. Any and all information collected by these third-party payment services for purposes of processing your payments is not available to us, unless you have otherwise provided this information to us in connection with your use of the Services. Information collected from you by these third-party payment services is governed by their own privacy policy. You should review the relevant data protection policy prior to submitting any information to the third-party payment service.

- Saatchi Art Gallery - saatchiart.com

As a vendor on the Saatchi Art Gallery, they may share your information and personal details with us in order to fulfil any order you may place using their online store. Any information shared with us will be processed and stored according to this policy.

You will be given the opportunity to opt-in to receive marketing communications, offers and promotions directly from Saatchi Art Gallery by way of post, email, phone, text or digital/ social media. You will be given the facility to opt-out of some or all of these communications at any time. Communications to / from the Saatchi Art Gallery are subject to the Saatchi Art Gallery policies and procedures.

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Saatchi Art Gallery Privacy Policy is available here (<https://www.saatchiart.com/privacy>)

- **Third Party Service Providers:**

We may share your personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT/Website service providers, printers, lawyers and other business advisors, marketing companies who carry out marketing campaigns on our behalf and providers of security and administration services. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is to ensure the provision of services to our customer and the effective management of the business.

- **An Gardai, Government Bodies or officials:**

We may share your personal information with an Gardai or other government bodies or agencies where required to do so by law.

3. Storage Periods

Where an order is fulfilled, we may hold your personal information for a period of 6 years from the date of completion of the contract where an order is placed. We may hold this data for a longer period if we are legally required to do so. At no time do we store credit card details from customers, these details are entered at the time of ordering into our secure online booking system managed by Saatchi and are not stored. Saatchi uses a secure payments process to protect customers and the data controller.

Personal Data collected with your consent for marketing purposes will be kept electronically for 2 years at the end of which you will be asked if you wish to be kept on our lists or removed. You can request your data to be removed from any of our databases at any time during the year.

4. Your Rights

You have several rights under data protection law in relation to how we use your personal information. You have the right, free of charge, to:

- check what type of personal data we hold about you and what we do with that information.
- You are also entitled to receive a copy of this information
- rectify any inaccurate personal information we hold about you
- erase personal information we hold about you
- stop us from using your personal information in certain cases, including if you believe that the personal information we hold about you is inaccurate or our use of your information is unlawful. If you exercise this right, we will store your personal information and will not carry out any other processing until the issue is resolved;

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- object to us using your personal information where we rely on our legitimate interests to use your information. We will stop using your personal information unless we can demonstrate an overriding legitimate grounds for the continued processing of this information; and
- receive your personal information in a structured, commonly used and machine-readable format and to have that data transmitted to another data controller.

These rights are in some circumstances limited by data protection legislation. If you wish to exercise any of these rights please contact us using the contact details below. We will endeavour to respond to your request within 1 month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will explain why.

You also have the right to lodge a complaint to the office of the Data Protection Commission.

5. Marketing from Evelyn Sorohan

In your engagement with us, you may opt-in to receive marketing communications, offers and promotions from us by email, by way of post, email, phone, text or digital/social media. You will be given the facility to opt-out of some or all of these communications at any time.

6. Customer Satisfaction Surveys

In an effort to improve our service to all our customers, we may contact you through customer satisfaction surveys by post, email, phone or digital/social media to gain feedback and information about our service to you.

You may opt-in to receive these surveys and will be given the option to opt-out at any time.

7. Contact Information

The contact person for any queries in relation to this Data Protection policy is :

Evelyn Sorohan

Phone

(+353) 087 989 0219

Email

evelynsorohanart@gmail.com