# Irish Historic Towns Atlas Transparency Statement and Retention Policies

### **Transparency statement**

This statement relates to Data Protection practices by the Irish Historic Towns Atlas (IHTA) in connection with the collection, and processing of information for the purposes of producing publications and disseminating information on launches, seminars and news from the project.

The IHTA is a research project hosted by the Royal Irish Academy (RIA), 19 Dawson Street, Dublin 2 (since 1981). It traces the topographical development of Irish towns and cities via the publication of fascicles (twenty-eight published by 2018) and ancillary publications including pocket maps. Annual seminars on various Atlas-based themes are held, as well as occasional launches, workshops, lectures, exhibitions and walking tours. The IHTA is part of a Europe-wide project that follows similar guidelines.

The IHTA respects your right to privacy. Any personal information that you volunteer to the IHTA will be treated strictly in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), EU 2016/679.

Most of the data we collect and process are for the compilation and production of our town atlases. Some categories of data rely on consent, viz. mailshots about launches, seminars or other outreach activities, or our annual IHTA newsletter. We also rely upon consent to take, use and retain your photograph.

We shall always let you know your rights under Data Protection laws, viz. to request access to your data; to request rectification of incorrect data or to have data updated, or deleted where appropriate.

## Data held by the IHTA relates to:

- Contributors (name and correspondence addresses)
- Outreach: attendees at launches and seminars (name and correspondence addresses)
- Repositories (name and correspondence addresses of partner or sources of permissions/licenses to use material)
- Enquiries and permissions (name and correspondence addresses
- Project and production files (name and correspondence addresses)
- Photographs (from events)

# **Retention policies:**

Contributors

- We engage in correspondence with contributors during the production of a town atlas fascicle and for the express purpose of progressing the publication to completion. Typically correspondence contains some personal data relating to the contributor. Correspondence is securely held with limited access by designated staff for the duration of the fascicle's compilation until post-production. Generally correspondence is retained indefinitely for the record and due to ongoing activities around the publication. Files are refined and data minimised on an annual basis so that only relevant documents are retained.
- Important email correspondence with contributors relating to their work is retained for as long as it is relevant and securely deleted thereafter.
- We request that contributors consent to be on our mailing list for notification of new IHTA publications, events and seminars as well as the IHTA annual newsletter: these all come under the umbrella of direct marketing.
- We also request that contributors consent to have their photograph taken, used and retained for publicity and record purposes.

Mailing lists (for outreach for seminars, launches and events)

- General mailing list. You need to opt-in using MailChimp, a US-based distribution facility which is regulated under the EU Privacy Shield; consent will be renewed every three years but we provide the option to unsubscribe with each new message.

- Annual seminar. We sometimes use Eventbrite, a US-based service regulated under the Privacy Shield. The event and all contact details will be deleted within 14 days of the event.
- Specific IHTA publication launches. Where email addresses have been supplied by the author of the publication for invitation to the launch, email RSVPs will be deleted within 14 days of the event.
- IHTA-specific workshops. At sign-up for workshops, delegates will be asked for their consent to receive feedback forms and information about follow-up workshops. Email addresses will be retained with consent for 3 years but the option to unsubscribe will be provided with each successive message.

Consents are retained for the duration of the consent. The data subject retains the right to withdraw consent at any time.

Correspondence (general enquiries and permission to reproduce items from IHTA publications):

- General enquiries relating to the project via email, phone, letter or in person will be logged in a spread sheet with relevant contact details so the resolution to the query may be relayed to the data subject. Email threads are securely deleted once the query is resolved. After two years, contact information and name of the data subject will be minimised to just the statistic, for audit and reporting purposes.

Permissions to use and reproduce material in atlases:

 Correspondence relating to permissions to reproduce atlas material will be retained securely with limited access for the duration of the project. The purpose of retention is for verification of rights granted and for renewal of rights.

### Photographs:

- Attendees at seminars, lectures or launches held as part of the IHTA will be informed that photographs may be taken during the event that may appear on the website, social media or in IHTA or RIA Newsletters. The Transparency Statement re collection and processing of photos will be available to attendees to enable them to make an informed decision re the collection and use of their images.
- Those who do not wish to be in photos may also indicate this to the photographer at the event.

#### Project files:

- Production. Includes correspondence related to individual town atlas fascicles, ancillary
  publications, online/digital projects. Items that relate to decisions are retained for
  lifetime of project electronically and printed on file (held in secure cabinet). This is
  material that may inform future project decisions or may be considered important for
  archival reasons. All other material deleted/discarded three years after publication or
  output.
- Minutes of IHTA board meetings for the purpose of managing the project and making key decisions in relation to it are retained indefinitely. All Academy minute books are archived with the Library for record and historical purposes.
- Accounts. Includes annual files (paper and electronic) for up to seven years (projects often spread over a number of years) are held securely with limited access by IHTA cartographic and managing editor. Files are minimized on a regular basis.
- Events. Includes correspondence related to individual events. Items that relate to decisions are retained for lifetime of project either electronically or printed on file (held in secure cabinet). This is material that may inform future project event decisions or may be considered important for archival reasons. All other material deleted/discarded three years after event or event cycle. Data minimized in the interim on a regular basis.

## 23 May 2018

- Curricula vitae. Those who send unsolicited CVs are contacted and asked to consent to their data being held on file in a secure cabinet or in a password-protected section of the IHTA server with limited access by designated staff members for three years. If the CV includes a PPS number, this will be deleted and the individual will be informed. CVs are not shared with third parties. The CV owner will be informed of his/her rights under GDPR.

The Data Protection Officer (DPO) for the Royal Irish Academy is Siobhán Fitzpatrick (<u>dataprotection@ria.ie</u>). Any data breaches will be reported to the DPO in the first instance.