# Privacy Policy for clareartista, Clare Galloway artist, The RSOA/ SORA

## Introduction:

As a visionary artist, I work with several different communication platforms and sales outlets for my art, writing and courses, to give me more creative space-time. I never take any payment or info directly from customers, as all my transactions must be registered online, for Italian taxing purposes: in many cases, the platforms and communication channels that I use; they store your information, so that I don't have to – sometimes I don't even have access to it, for your own privacy and security.

I'm also a person of very high integrity and values, with the utmost respect for my clientele and followers, and under *absolutely no circumstances* would I willingly allow your information to go astray or be used in any way other than how I am outlining in this document.

I am a sole trading artist, running all aspects of my business by myself: I communicate directly only with occasional, tailored specific offers on my unique art, writing and/ or courses, and with important news about or changes to the services/ courses/ patronage that you are signed up for.

We (you and I) might also use private messaging via e.g. Patreon or Etsy, to discuss orders and/ or to connect in friendship, and/ or for me to respond to your queries about my art or lifestyle, e.g.

## Information I Collect:

In order to follow through on any sign-up, enrolment, order, purchase, patronage, or any kind of booking, you have to provide certain information to me, and to do that, you must permit Wordpress and/ or Mailchimp and/ or Etsy and/ or Teachable and/ or Patreon to gather your info, and then to pass it to me.

This info will usually consist of only your name and email address – though if an item has to be mailed to you, it will also include your postal address, payment information, and the details of the product that you're buying. Your postal address and payment info are shared via e.g. the Etsy payment platform, and I only write your postal address on a piece of paper, so that I can take it up to the Post Office, and then mail the bought item to you. You might also send me other personal information (for a custom order, for example), by contacting me through a direct communication e.g. on Etsy.

Why I Need Your Information and How I Use It

I follow specific legal routes (as per each platform and/ or communication facility that I use) to gather, utilise, and share your information, including these:

- when you've provided clear consent (which you may rescind at any time) like when you sign
  up for my newsletter mailing list
- as required to provide my services, such as when I use your information to fulfil your order, to settle any dispute, or to provide your customer support
- if necessary to comply with any legal requirement or court order or in connection with a legal claim, like keeping information about your purchases if this is dictated by tax law in my country
- and as required for my legitimate interests, if those interests aren't overruled by your rights and interests, like a) bettering my services your info is used to provide services that you request and in my genuine interest to improve my services; b) compulsory conforming with e.g. the Etsy Seller Policy and Terms of Use, where your info is used as needed to comply with my responsibilities under the Etsy Seller Policy and Terms of Use.

For further information on the platforms that I use: here are links to all of their privacy policies, and their terms and conditions:

Wordpress:

Privacy Policy: https://automattic.com/privacy/

Terms Of Use: https://en.wordpress.com/tos/

Mailchimp:

https://mailchimp.com/legal/privacy/

https://mailchimp.com/legal/terms/

**TEACHABLE:** 

Privacy Policy: https://teachable.com/privacy-policy

Terms Of Use: https://teachable.com/terms-of-use

Etsy:

Privacy Policy: https://www.etsy.com/legal/privacy/

Terms Of Use: https://www.etsy.com/legal/terms-of-use

Patreon:

Privacy Policy: https://www.patreon.com/privacy

Terms Of Use: https://www.patreon.com/legal

## Information Sharing and Disclosure

My customers' information is super-precious, and its security is an absolute priority in my business. I share your personal information for <u>very few, select reasons</u> and only in <u>very particular circumstances</u>, such as these:

- Etsy: I share information with Etsy in particular, as necessary to provide you my services and comply with my obligations under both the Etsy Seller Policy and Etsy Terms of Use.
- Couriers and other service providers: I trust certain professional third parties to carry out services for my Etsy shop. I'll share your personal info (e.g. your postal address) with them, but only as needed to perform the services that you have requested, and with the knowing that they are reliable business folks.
- Closing of my business: If I ever give up working as an artist and/ or close any or all of my businesses, I may disclose your info to government bodies (e.g. for taxing purposes), but only in the limited capacity that the law (in Italy) demands.
- Compliance with laws: I might gather, utilise, keep, and share your info if I have a genuine understanding that I am obliged to: (a) engage in any legal process or to respond to government requirements; (b) enforce my contracts and/ or my terms and policies; (c) avoid or look into or to tackle fraud or any other unlawful practises, security, or technical problems arising; and/ or (d) to protect the rights, property, and security of my customers or others.

## **Data Retention**

I hold onto your private info <u>only for as long as</u> it's absolutely necessary to bring you my services, and as outlined in my Privacy Policy (i.e. in this text). BUT, I may also be obligated to keep this info to follow legal and regulatory requirements and/ or to resolve disputes and/ or to enforce any contracts or agreements. So far as I understand, this means keeping data for 6 years, to comply with Italian (e.g. tax) laws and regulations.

Transfers of Personal Information Outside the EU

It's likely that I'll keep and handle your information through third-party hosting in the US (or other jurisdictions), as this is where the platforms I'm using, like Wordpress and Patreon, are based. This means that I might be moving your personal info to a territory with different data protection and government surveillance laws than your own. In all cases, your information will be moved and stored with trusted companies, that I understand to have impeccable standards and very high security capacities.

## Your Rights

If you live in certain jurisdictions, like the European Union, you have certain special privileges related to your personal info. Some of the rights are general, but certain rights apply only in a very few specific situations, like in these outlined below:

- Access: You have the privilege of accessing and asking for a copy of the personal info that I
  have of yours, by contacting me directly (my email and mailing address are below).
- Alter, relinquish, erase: You also have rights to change and/ or restrict my use of and/ or to have your personal info fully deleted. Apart from super-special conditions (such as when I'm obligated to store records for legal motives, as described above) I'll mostly be able to delete your personal information fully, as per your request.
- Objections: You might object to (a) my treatment of your info based on my genuine interests and (b) getting promotional messaging from me, even after giving me your clear consent to be given them. In this case, I'll delete your personal data, <u>unless</u> I have persuasive and legitimate grounds to keep using the data, or if it's required of my to keep it for legal reasons.
- Complaints: If you live within the EU and want to flag up a genuine issue with my use of your data, you absolutely have the right to do this via a local data protection authority.

## How to Contact Me

For purposes of EU data protection law, I, Clare Galloway (clareartista), am the data controller of your personal information. If you have any queries or worries, please do contact me at clareartista@gmail.com. You are welcome also to write to me at this address: Strada Filippo Maria Guidi 15, Guardia Sanframondi, 82034, BN, Italia.