

# The Everyman - Privacy Policy

The Everyman (registered business name Everyman Palace CLG) is a registered Arts Charity (number 20150952) that processes data for purposes necessary to fulfil its aims and charitable objectives.

This privacy statement outlines how we process data for our:

- Ticket buyers, online users, members and donors
- Participants in our Learning and Participation activities and members of our ensembles
- Other volunteers and participants
- Suppliers, industry contacts and customers
- Job applicants

Our promise to you is that we will use any personal data in accordance with the the EU General Data Protection Regulations, as enacted in the Data Protection Bill 2018. We aim to be clear, honest and open in the way we use your data, use it in ways you should reasonably expect us to, and to stop using it should you request us to, or after you cease to engage with us for a reasonable length of time. This statement sets out the ways in which The Everyman uses your data and how you can hold us accountable for that.

**Personal data** for these purposes means any information relating to an identified or identifiable person.

This statement covers the following areas (hyperlinks to each section):

- [Data collection](#)
- [Use of data](#)
- [Sharing data with third parties](#)
- [How to update your data](#)
- [Data integrity and security](#)
- [Your rights](#)
- [Who to contact](#)

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## Data collection

We may collect personal data from you when you buy a ticket, join or renew a membership, join our mailing list or ask us to send you information, make a donation, pledge a legacy, attend an event, visit our premises, volunteer or participate in a project or group, supply goods/ services to us, pay us for goods/services or apply for a job. The ways in which we collect data from you are listed below:

(Drop down list)

- [Ticket buyers, online users, members and donors](#)
  - [Participants in our Learning and Participation activities and members of our ensembles](#)
  - [Volunteers and other participants](#)
  - [Suppliers, industry contacts and customers](#)
  - [Job applicants](#)
-

## Use of data

We will use your information for the purposes listed below under one of the following legal bases:

- Performance of a contract between us and you
- Your consent (where we require it)
- To comply with a legal obligation or
- Our Legitimate interest, or that of a third party

The ways in which we use your data are listed below:

(Drop down list)

- [Ticket buyers, online users, members and donors](#)
  - [Participants in our Learning and Participation activities and members of our ensembles](#)
  - [Volunteers and other participants](#)
  - [Suppliers, industry contacts and customers](#)
  - [Job applicants](#)
- 

## Sharing data with third parties

The personal information that you give us will never be supplied to anyone outside THE EVERYMAN for contact purposes without first obtaining your consent, unless we are obliged or permitted by law to disclose it, we need to use the services of 'data processors' to fulfil your requirements, to support analysis and research for THE EVERYMAN or the Arts Sector, or for reporting to our funders.

The ways in which we share data with third party organisations are listed below:

(Drop down list)

- [Ticket buyers](#), online users, [members and donors](#)
  - [Participants in our Learning and Participation activities](#) [and members of our ensembles](#)
  - [Volunteers and other participants](#)
  - [Suppliers, industry contacts and customers](#)
  - [Job applicants](#)
- 

## How to update your data?

The ways in which you can update your information are listed below:

(Drop down list)

- [Ticket buyers, online users, members and donors](#)
  - [Participants in our Learning and Participation activities and members of our ensembles](#)
  - [Volunteers and other participants](#)
  - [Suppliers, industry contacts and customers](#)
  - [Job applicants](#)
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## Data integrity and security

We take steps to ensure that data is accurate, complete and up to date, and we regularly run checks to review our data. If you wish to correct any inaccuracies in your data, please email [info@everymancork.com](mailto:info@everymancork.com). We regularly review email and paper correspondence and minimise our storage through archiving and destruction of out of date materials.

### Data retention

We will retain your information for as long as is necessary to provide you with the services you have requested or require from us as detailed below:

(Drop down list)

- [Ticket buyers, online users, members and donors](#)
  - [Participants in our Learning and Participation activities and members of our ensembles](#)
  - [Volunteers and other participants](#)
  - [Suppliers, industry contacts and customers](#)
  - [Job applicants](#)
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## Your rights

You have rights, including the following:

- To be informed of the ways in which we use your information, which we seek to do in this policy
- To request us to stop processing your personal data for marketing purposes
- To request a copy of the personal information we hold about you
- To request that any inaccuracies in the data we hold about you are corrected
- In certain circumstances to request that we limit, cease processing or erase your personal data.
- To lodge a complaint with the Data Protection Commissioner <https://www.dataprotection.ie/>

## Who to contact

Email us: [info@everymancork.com](mailto:info@everymancork.com)

Write to us: Data Protection, The Everyman, 15 MacCurtain Street, Cork, T23 E094, Ireland

### Complaints:

If you wish to make a complaint about how we are using your data, please email [info@everymancork.com](mailto:info@everymancork.com)

### Subject Access Requests:

If you wish to make a subject access request (SAR), please email <https://www.dataprotection.ie/>. We will try to respond to all legitimate requests within 30 days. Occasionally it may take us longer if your request is particularly complex or if you have made a number of requests, in which case we will keep you notified and updated. We will require specific details of your request and proof of identification.

## **Changes to this statement**

We may change or update this Privacy Statement from time to time. Any significant changes will be communicated on our website and/or by contacting you directly.

18 May 2023

## [1: Drop down text\_Data collection]

Drop down 1A: Ticket buyers, online users, members and donors

We may collect or store the following information from you when you buy a ticket or other item from us, use our website, join a membership scheme, make a donation, attend a concert or event, visit our website or premises, or contact us with an enquiry.

- Name
- Postal Address
- Telephone number(s)
- Email address
- Billing / payment information
- Ticketing, membership and/or donation history
- Communications preferences
- Access requirements
- Allergies and dietary requirements
- Any other information you provide to us by email, letter, telephone, social media, via our website or in person
- Photographs and/or video footage of audiences
- CCTV footage for the security of property and individuals in and around our building

### ***Sensitive information***

This includes health information (if you provide us with this) such as access needs or allergies.

### ***Online information***

We use some **online tracking and analysis services**, such as Google Analytics, to find out how our website is being used, which activities are working best, and how we can improve our customer experience online.

Like most websites, we receive and store certain details whenever you use the The Everyman website. We use “cookies” to help us make our site – and the way you might use it – better. Cookies mean that a website will remember you and enable online transactions. It also helps us understand how you use our website, where we can make improvements and how best to tell our audiences about events they might be interested in, through recommendations on our own site, or adverts elsewhere on the internet.

We keep a record of the communications we send you, and we may track whether you receive or open electronic communications so that we can ensure we are sending you the most relevant information.

We use social media to provide updates on our activities, to promote events and projects or to communicate with you about the activities in which you are involved. We may tailor adverts on social media and elsewhere online relevant to your interests. Depending on your own privacy settings with each social media provider, you can control The Everyman’s permission to access information via social media platforms.

### ***Data from third parties***

We may also obtain or collect personal information about you from other third party sources, for example:

- If we engage external suppliers for photography and video capture
- Publicly available information, such your biography on your work website or information that has been published in articles/ newspapers.

- From our board members or other volunteers, for example if they invite you to a concert or event
  - From an organisation which funds or works in partnership with The Everyman, for example if you meet with us or attend an event as a representative of the organisation
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## Drop down 1B: Participants in our Learning and Participation activities and members of our ensembles

We may collect or store the following information from you when you choose to participate in one of our activities, or apply to join one of our ensembles, attend a concert or event, visit our website or premises, or contact us with an enquiry

- Name of participant (and parent where required)
- Postal Address
- Telephone number(s)
- Email address
- Billing / payment information
- Communications preferences
- Access requirements
- Allergies and dietary requirements
- Any other information you provide to us by email, letter, telephone, social media, via our website or in person
- Musical experience or career information
- Photographs and/or video footage of participants
- CCTV footage for the security of property and individuals in and around our building

### ***Sensitive information***

We may collect sensitive data from you including health information (if supplied) such as access needs, medical conditions or allergies.

We may ask you to provide details of your protected characteristics for diversity monitoring purposes, and to complete our annual returns to the Arts Council and other public bodies. You will always have the option not to respond to any questions you do not wish to answer. Where we obtain data for children, this is only recorded with explicit parental consent.

### ***Data from third parties***

We may also obtain or collect personal information about you from other third party sources, for example:

- We may ask parents / guardians or schools to supply information about under 18s for participation in our projects or for performance licensing purposes.
  - If we engage external suppliers for photography and video capture
  - If your details are given as an emergency contact for a member of one of our projects
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## Drop down 1C: Volunteers and other participants

We may collect or store the following information from you when you express an interest in volunteering/participating, or continue to volunteer/participate with us.

- Name
- Postal Address
- Telephone number(s)
- Email address
- Access requirements
- Allergies and dietary requirements
- Any other information you provide to us by email, letter, telephone, social media, via our website or in person
- Photographs and/or video footage of participants
- CCTV footage for the security of property and individuals in and around our building

### ***Sensitive information***

We may collect sensitive data from you including health information (if supplied) such as access needs, medical conditions or allergies.

We may ask you to provide details of your protected characteristics for diversity monitoring purposes, and to complete our annual returns to the Arts Council and other public bodies. You will always have the option not to respond to any questions you do not wish to answer. Where we obtain data for children, this is only recorded with explicit parental consent.

### ***Data from third parties***

We may also obtain or collect personal information about you from other third party sources, for example:

- Referees may provide information to us about your experience and competence
- If we engage external suppliers for photography and video capture

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### ***Drop down 1D: Suppliers, industry contacts and customers***

We may collect or store the following information from you when you supply goods or services to us, purchase services from us or are recommended to us:

- Name of company
- Name of designated contact(s)
- Postal Address
- Telephone number(s)
- Email address(es)
- Billing / payment information including bank details
- Record of goods/services received/provided
- Any other information you provide to us by email, letter, telephone, social media, via our website or in person
- CCTV footage for the security of property and individuals in and around our building

### ***Data from third parties***

We may also obtain or collect personal information about you from other third party sources, for example:

- Recommendations from other organisations / clients

- Publicly available information about you from your website
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#### Drop down 1E: Job applicants

We may collect or store the following information from you when you apply for a job with us:

- Name
- Postal Address
- Telephone number(s)
- Email address
- Access requirements
- Any other information you provide to us by email, letter, telephone, social media, via our website or in person
- Experience or career information
- CCTV footage for the security of property and individuals in and around our building

#### ***Sensitive information***

This includes health information (if supplied) such as access needs or allergies. We may ask for other information specific to the opportunity you are applying for, and information to support our equal opportunities monitoring).

#### ***Data from third parties***

We may also obtain or collect personal information about you from other third party sources, for example:

- References from previous employers
  - Publicly available information about you online
-



## [2 Drop Down text\_ Use of data]

Drop down 2A: Ticket buyers, online users, members and donors

We use the information we hold:

|   |   |
|---|---|
| To inform you of any change to or additional information regarding a booking, visit or membership   | <i>Performance of a contract</i>  |
| To analyse your personal information to create a profile of your interests and preferences so that we can contact you with information most relevant to you | <i>Legitimate interest</i>  |
| To inform you about relevant concerts, events, services or activities we believe will be of interest, as well as opportunities to support our work          | <i>Consent – mailing list</i><br><i>Legitimate Interest – ticket buyers</i> |
| To process donations and payments, including making Gift Aid claims and thanking donors   | <i>Performance of a contract</i>  |
| To ensure we know how you prefer to be contacted about our activities   | <i>Legitimate interest</i>  |
| To assist us with reporting and analysis for our own business needs, and those of our funding partners  | <i>Legitimate interest</i>  |
| To keep a record of the relationship we have with you   | <i>Legitimate interest</i>  |
| To promote our work to funders, supporters and the general public via media and social media outlets  | <i>Legitimate interest</i>  |
| To profile ticket bookers and donors in order to inform future fundraising approaches   | <i>Legitimate interest</i>  |
| To maintain the security of property and individuals in and around our building using CCTV footage  | <i>Legitimate interest</i>  |

### **Contacting you by Post, email and Telephone**

If you have given us your postal address when booking tickets and do not want to receive information from us by post about events, offers or our fundraising activities, you have the option to change any of your contact preferences at any time by contacting [info@everymancork.com](mailto:info@everymancork.com).

If you have provided your email address when you purchased your ticket, from time to time we will send you information about similar events, ticket offers or to ask your opinion via occasional customer surveys. Should you wish not to receive this information you will be given the option to opt out when purchasing a ticket or via the unsubscribe link on any emails we send you. Alternatively, you can tell us directly by emailing [info@everymancork.com](mailto:info@everymancork.com).

If you have signed up to join our e-mailing list we will send you information by email about our events, ticket offers, opportunities to support our work, or to ask your opinion via occasional customer surveys. You will always have the option to unsubscribe from future emails via the unsubscribe link on any emails we send you. Alternatively, you can tell us directly by emailing [info@everymancork.com](mailto:info@everymancork.com).

If you have provided your telephone number when you purchased your ticket or directly to The Everyman, we may use this to inform you of a cancelled or re-arranged performance, to gain your views on our service, or to talk to you about relevant opportunities to support our work as an Arts Charity. Should you wish not to receive marketing or fundraising calls from us please let us know via [info@everymancork.com](mailto:info@everymancork.com).

## Membership

Customers joining one of our membership schemes will receive information by email and post relating to events and activities as a paid-for benefit of the scheme.

## Fundraising and profiling

As a charity, THE EVERYMAN relies on donations from individuals to support its charitable purposes. To do this, we look to identify individuals who, in addition to being purchasers of tickets, may be interested in supporting our charitable objectives through other means, including charitable donations. We also review whether existing donors may wish to provide further financial support.

To enable us to do this in an efficient, effective and focused way, and to ensure the requests we make are appropriate, proportionate and tailored, we may use publicly available information (collected either in-house or by third parties) to identify whether or not you are likely to wish to provide additional donations to The Everyman. We do not allow third parties to use the data we provide them about you for other purposes.

The information that we may process includes publicly available information relating to your wealth (including house price values), whether you are a trustee of a charity or have previously donated to similar charities, or raised funds for charitable purposes, in addition to your interest in the arts.

We understand that not all of our audience members or donors will want us to carry out such processing and you are free at any time to ask us to stop doing this in respect of your data. You can do this by contacting [info@everymancork.com](mailto:info@everymancork.com). If you do this we will delete the information that we have collected about you for these purposes.

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## Drop down 2B: Participants in our Learning and Participation activities

We use the information we hold:

|  |                                  |
|--|----------------------------------|
| To keep you fully informed of all arrangements relating to your involvement with [ORGANISATION A], including rehearsals and concerts | <i>Consent</i>                   |
| To keep you informed of ticket offers when available   | <i>Consent</i>                   |
| To keep a record of the relationship we have with you  | <i>Legitimate interest</i>       |
| To process payments when required  | <i>Performance of a contract</i> |
| To apply for appropriate licensing for child performers where necessary  | <i>Legal requirement</i>         |
| To ensure compliance with policies, procedures and laws  | <i>Legal requirement</i>         |
| To publish lists of participants in our printed programmes   | <i>Legitimate interest</i>       |
| To promote our work to funders, supporters and the general public via media and social media outlets                                 | <i>Legitimate interest</i>       |
| To maintain the security of property and individuals in and around our building using CCTV footage                                   | <i>Legitimate interest</i>       |

## Drop down 2C: Volunteers and other participants

We use the information we hold:

|  |                                  |
|--|----------------------------------|
| To keep you fully informed of all arrangements relating to your involvement with [ORGANISATION A], including volunteering/participation opportunities and activities | <i>Consent</i>                   |
| To keep you informed of ticket offers for volunteers/participants when available   | <i>Consent</i>                   |
| To keep a record of the relationship we have with you  | <i>Legitimate interest</i>       |
| To process payments when required  | <i>Performance of a contract</i> |
| To ensure compliance with policies, procedures and laws  | <i>Legal requirement</i>         |
| To promote our work to funders, supporters and the general public via media and social media outlets   | <i>Legitimate interest</i>       |
| To maintain the security of property and individuals in and around our building using CCTV footage   | <i>Legitimate interest</i>       |

## Drop down 2D: Suppliers, industry contacts and customers

We use the information we hold:

|  |                                  |
|--|----------------------------------|
| To contact you regarding the contract we have, or may wish to have with you                        | <i>Performance of a contract</i> |
| To keep a record of the relationship we have with you  | <i>Legitimate interest</i>       |
| To keep you informed of our activities   | <i>Legitimate interest</i>       |
| To process payments to/from you when required  | <i>Performance of a contract</i> |
| To ensure compliance with policies, procedures and laws  | <i>Legal requirement</i>         |
| To maintain the security of property and individuals in and around our building using CCTV footage | <i>Legitimate interest</i>       |

## Drop down 2E: Job applicants

We use the information we hold:

|   |                |
|---|----------------|
| To process your application and communicate with you regarding the selection and interview process. | <i>Consent</i> |
|---|----------------|

|  |                            |
|--|----------------------------|
| To maintain the security of property and individuals in and around our building using CCTV footage | <i>Legitimate interest</i> |
|--|----------------------------|

### [3: Drop down text\_Sharing data with third parties]

Drop down 3A: Ticket buyers, online users, members and donors

|  |                                  |
|--|----------------------------------|
| When you book for one of the artists/companies performing at our venue, you may be asked if you would like to receive information directly from them about their activities in the future.   | <i>Consent</i>                   |
| To operate our IT systems, such as our database system Ticketsolve, and email distribution software Mailchimp  | <i>Performance of a contract</i> |
| To use specialist support services, such as our mailing house, to distribute our mailings  | <i>Performance of a contract</i> |
| With agreement about data management protocols, we may make anonymised data available to other agencies such as <a href="#">Theatre Forum Ireland</a> for analysis and research purposes (for instance, comparison sales trends over time). This assists with reporting to funders and strategic planning, helping us to make better business decisions. | <i>Legitimate interest</i>       |
| We may take photographic or video recordings and share these with media and social media outlets. We always make clear when photography or recordings are taking place.  | <i>Legitimate interest</i>       |
| We publish lists of supporters and donors in our printed programmes or on our website but you can request us not to include your information should you wish.  | <i>Legitimate interest</i>       |
| We share data with fundraising prospect companies in order to undertake profiling  | <i>Legitimate interest</i>       |
| To maintain the security of property and individuals in and around our building using CCTV footage   | <i>Legitimate interest</i>       |

We have agreements in place with each provider to ensure your data is secure and cannot be accessed or used for any other purpose. Your personal data is never sold.

Drop down 3B: Participants in our Learning and Participation activities and members of our ensembles

|   |   |
|---|---|
| To operate our IT systems, such as our database system Ticketsolve, email distribution software Mailchimp   | <i>Performance of a contract</i>                |
| We may share your details with a freelance workshop leader, or chaperone (for children’s activities) in order to run the activity effectively or to provide relevant authorities with information required to process performance licenses. | <i>Consent (parental consent for under 18s)</i> |
| We may take photographic or video recordings and share these with media and social media outlets. We always make clear when photography or recordings are taking place.   | <i>Legitimate interest</i>                      |
| We may take photographic or video recordings of under 18s and share these with media and social media outlets.  | <i>Parental Consent</i>                         |
| To maintain the security of property and individuals in and around our building using CCTV footage  | <i>Legitimate interest</i>                      |

We have agreements in place with each provider to ensure your data is secure and cannot be accessed or used for any other purpose. Your personal data is never sold.

Drop down 3C: Volunteers and other participants

We may share your data with **third party organisations** as listed below:

|  |   |
|--|---|
| To operate our IT systems, such as our database system Ticketsolve, and email distribution software Mailchimp  | <i>Performance of a contract</i>                |
| We may share your details with an external project manager in order to run the activity effectively or to provide relevant authorities with information required for access and/or safety for the activity you have signed up for. | <i>Consent (parental consent for under 18s)</i> |
| We may take photographic or video recordings and share these with media and social media outlets. We always make clear when photography or recordings are taking place.  | <i>Legitimate business interest</i>             |
| We may take photographic or video recordings of under 18s (with parental consent) and share these with media and social media outlets.   | <i>Consent</i>                                  |
| We publish lists of participants, supporters and donors in our printed programmes, but you can request us not to include your information should you wish.   | <i>Legitimate business interest</i>             |
| With Companies House, Charity Commission, our auditors and professional advisers to ensure compliance with legal, governance and other regulatory requirements   | <i>Legal requirement</i>                        |

We have agreements in place with each provider to ensure your data is secure and cannot be accessed or used for any other purpose. Your personal data is never sold.

Drop down 3D: Suppliers, industry contacts and customers

|  |                                  |
|--|----------------------------------|
| To operate our IT systems, such as our finance payment and receiving systems   | <i>Performance of a contract</i> |
| We share financial data with relevant government departments, our internal & external auditors and other regulatory bodies in order to fulfil our legal and charitable responsibilities. | <i>Legal requirement</i>         |
| We may recommend your services to other organisations  | <i>Legitimate Interest</i>       |
| To maintain the security of property and individuals in and around our building using CCTV footage   | <i>Legitimate interest</i>       |

We have agreements in place with each provider to ensure your data is secure and cannot be accessed or used for any other purpose. Your personal data is never sold.

Drop down 3E: Job applicants

|  |                            |
|--|----------------------------|
| We may occasionally engage external advisors to sit on recruitment or interview panels, and would share your application details with them | <i>Legitimate interest</i> |
|--|----------------------------|

|  |                            |
|--|----------------------------|
| To maintain the security of property and individuals in and around our building using CCTV footage | <i>Legitimate interest</i> |
|--|----------------------------|

We have agreements in place with each provider to ensure your data is secure and cannot be accessed or used for any other purpose. Your personal data is never sold.

#### **[4: Drop down text\_ How to update your data?]**

Drop down 4A: Ticket buyers, online users, members and donors

You can update your personal contact and communication preferences data at any time, by visiting your THE EVERYMAN account online, or by contacting us at [info@everymancork.com](mailto:info@everymancork.com). Every promotional email we send you will contain an option to unsubscribe, or you can contact us at [info@everymancork.com](mailto:info@everymancork.com).

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Drop down 4B: Participants in our Learning and Participation activities and members of our ensembles

You can ask us to update your information, or how you hear from us by contacting [info@everymancork.com](mailto:info@everymancork.com)

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Drop down 4C: Other volunteers and other participants

You can ask us to update your information, or how you hear from us by contacting [info@everymancork.com](mailto:info@everymancork.com)

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Drop down 4D: Suppliers, industry contacts and customers

You can ask us to update your information, or how you hear from us by [info@everymancork.com](mailto:info@everymancork.com)

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Drop down 4E: Job Applicants

You can ask us to update your information, or how you hear from us by contacting [info@everymancork.com](mailto:info@everymancork.com)



## [5: Drop down text\_ Data integrity and security]

Drop down 5A: Ticket buyers, online users, members and donors

We will store data in our database system(s) for a maximum of **five years** after your last engagement with us, through ticket, gift voucher or membership purchases, or making donations. At that point your data will be suppressed, no longer processed, and you will cease to receive communications from us, unless:

- We must keep it to comply with applicable laws or evidence compliance with such applicable laws
  - There is an outstanding issue, claim or dispute requiring us to keep such information until resolution
  - The information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security
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Drop down 5B: Participants in our Learning and Participation activities and members of our ensembles

We will store data in our database system(s) for a maximum of **five years** after your last engagement with us, through participating in our work, or requesting to be kept up to date with our activities. At that point your data will be suppressed, no longer processed, and you will cease to receive communications from us, unless:

- We must keep it to comply with applicable laws or evidence compliance with such applicable laws
  - There is an outstanding issue, claim or dispute requiring us to keep such information until resolution
  - The information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security
- 

Drop down 5C: Volunteers and other participants

We will store data in our database system(s) for a maximum of **five years** after your last engagement with us, through your volunteering work, or requesting to be kept up to date with our activities. At that point your data will be suppressed, no longer processed, and you will cease to receive communications from us, unless:

- We must keep it to comply with applicable laws or evidence compliance with such applicable laws
  - There is an outstanding issue, claim or dispute requiring us to keep such information until resolution
  - The information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security
- 

Drop down 5D: Suppliers, industry contacts and customers

We will store data in our database and finance system(s) for as long as you continue to purchase services from us, supply us with goods and/or services, or **6 years plus the current tax year**, where the relationship is not ongoing. At that point your data will be suppressed and no longer processed, unless:

- We must keep it to comply with applicable laws or evidence compliance with such applicable laws
- There is an outstanding issue, claim or dispute requiring us to keep such information until resolution
- The information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security

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### Drop down 5E: Job applicants

For unsuccessful candidates, we will store data in our HR systems for 6 months following your application, at which point it will be deleted, unless:

- There is an outstanding issue, claim or dispute requiring us to keep such information until resolution

Successful candidates' data will be kept under the terms of the Privacy Statement (internal) which will be issued to all employees on appointment.

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