

Definitions

“Integra”, “Our”, and “We”	means Integra Planner, GALA Choruses I, Inc., a company incorporated in Delaware (DE) USA. Integra operates the Services and is known as “Integra”.
“Client”	means Individual or legal entity that enters into a contract with Integra to supply services. Example Clients are festival and conference organisers or membership organisations.
“User” and “You”	means those who create an Integra account to access services. Users will typically include people working for the Client, and customers, volunteers and employees for festivals, venues, conferences or organisations.

This document outlines our information gathering and dissemination practices, how we collect, use, disclose, transfer, store and share your data, along with the choices that you have with your data.

Privacy Notice

Our fundamental principles below are incorporated and clarified in this Privacy Notice **“Privacy Notice”**.

We are thoughtful about the personal information We ask You to provide and the personal information that We collect about You through the operation of Our services.

Your personal information is stored in Integra for as long as there is a reason to keep it and set out in the contract between Integra and the Client

We aim to make it as simple as possible for You to control your information.

We aim for full transparency on how We gather, use, and share Your personal information.

1. What Integra does and what this policy covers

1.1 Integra offer products and services to enable our Clients to plan and organise events like festivals and conferences, and their organisations with You, Our Users, anywhere in the world. Our Privacy Notice complies with the any data protection legislation from time to time in force in the UK including the Data Protection Act, the General Data Protection Regulation (GDPR), the UKGDPR or any successor legislation, as well as **EU General Data Protection Regulation** (GDPR) and applies to all of Our services, Clients and Users worldwide.

1.2 On our website <https://www.integraplanner.com> we are the “Data Controller” (as defined in the GDPR).

- 1.3** Our mission is to offer the full range of integrated services to Our Clients and Users.
- 1.4** We contract with Our Clients' to provide data processing services through our Client websites.
- 1.5** On Our Client websites, Our Clients are the Data Controller; who contracts to supply with You, the User.
- 1.6** Our Client websites are self-service, enabling You to enter Your own personal data into the services, which You can review and edit at any time.
- 1.7** If You contract with a Client based outside the EEA for a service or festival, We will ask you to consent to Your data being transferred outside the EEA.
- 1.8** This Privacy Notice applies to information that We collect about You, when You use:
- a. our marketing websites, including <https://www.integraplanner.com>;
 - b. the event, Client, service websites operated under license from Integra to organise events;
 - c. our mobile applications, including Integra schedule mobile app for event attendees / Users; and
 - d. other products and services including Integra for groups.

This is Integra's Privacy Notice; you may see some overlap with our Clients privacy notice.

2. As Data Processors Integra will:

- a. maintain adequate documentation under GDPR regulations;
- b. cooperate with national supervisory authorities: the UK's independent authority is the Information Commissioners Office (ICO) that upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals;
- c. implement appropriate security standards;
- d. notify the Data Controller and/or ICO about security breaches;
- e. comply with International data transfer rules;
- f. only process personal data in accordance with the Client's instructions; and
- g. not engage other data processors without written consent.

3. Integra's relationship with your Data Controller the Client

- 3.1** The Client contract contains details of the data processing and sets out:
- a. the subject matter and duration of the processing;

- b. the nature and purpose of the processing;
- c. the type of personal data and categories of data subjects; and
- d. the obligations and rights of the controller.

3.2 Integra terms include commitments and obligations under the GDPR Regulations

3.3 Sub-processors are only engaged with written Client permission. We are liable for the performance of the sub-processors processing obligation and are subject to provisions of this Privacy Notice and the equivalent contractual obligations with the Client.

4. Privacy Notice Changes

4.1 This is a living document and We will make changes.

4.2 We will note these key changes at the front of future versions of these documents.

4.3 We will notify You by notice (such as adding a statement to Our homepage or sending You a notification through e-mail or on Your Integra dashboard).

5. Questions or Queries

5.1 If you have any questions about this Privacy Notice or Your data please contact us.

Email: support@integraplanner.com

Mail: Integra Planner, GALA Choruses I, Inc, P.O. Box 99998, Pittsburgh, PA, 15233.

6. Information We Collect

6.1 We only collect information about You when there is a reason to do so - for example, to provide the goods of our Clients through Our services, to communicate with You, or to make Our services better.

6.2 **Personal data** including: Your name, home address, telephone number, email address.

6.3 **We collect information in three ways:** when you provide information to us; automatically through operating Our services; and from outside sources.

6.4 **Information that You provide:** the amount and type of information depends on the context and how the Client uses Your data to deliver their goods and services to You.

6.5 **Transaction and Billing Information:** If You buy something from our Clients through our services You will provide additional personal and payment information that is required to process Your payment through a payment provider (like PayPal). For example - Your name, credit card information, and contact information. We do not store or have access to Your payment card information. We do store Your

payment reference provided by the payment provider against the transaction detail in the services.

6.6 Content Information: Depending on the services You use, You may also provide us with information about You. For example - biographies, for publication in programmes and in marketing.

6.7 Communications with Us: You may also provide us information when You respond to surveys, feedback or seek support.

6.8 Information that we collect automatically

a. **Log Information:** information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating services, and mobile network information.

b. **Usage Information:** about Your usage of Our services. For example, information about the actions that site administrators and users perform on a site; in other words, who did what, when and to what. We also collect information about what happens when You use Our services (e.g., page views, support document searches, along with information about Your device (e.g., mobile screen size, name of cellular network, and mobile device manufacturer). We use this information to provide Our services to You, as well as get insights on how people use Our services, so we can make Our services better.

c. **Location Information:** We may determine the approximate location of Your device from your IP address. We collect and use this information to, for example, to calculate how many people visit Our services from certain geographic regions. We may also collect information about Your precise location via Our mobile apps, for example, when you post a photograph with location information, or to provide directions to a location. You can change these permissions through Your mobile device operating system.

d. **Stored Information:** We may access information stored on Your mobile device via Our mobile app. You can change these permissions through Your mobile device operating system. For example, if You give us permission to access the photographs on Your mobile device's camera.

6.9 Information We Collect from Other Sources

a. We may also get information about You from other sources. For example, if You create or log into Your account through another service (like Google) or if You connect an account to a social media service (like Twitter, Facebook), We will receive information from that service (such as your username and basic profile information) via the authorisation procedures used by that service. The information We receive depends on which services You agree to in Your device settings and any options that are available.

- b. You may be associated with an organisation, which You have authorised to enter information about you. For example – to register and / or pay for an event using a payment provider like PayPal.

8. How We Use Your Information

8.1 We use information about You to:

- a. provide Our services - for example, to set up and maintain your account, so event organisers the Clients can provide you with the products and services;
- b. further, develop Our services - for example by adding new features that We think Our Users will enjoy or will improve Your experience of services and products offered through Our services;
- c. monitor and analyse trends to better understand how Users interact with Our services, which helps us improve Our services and make them easier to use;
- d. monitor and protect the security of Our services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of Integra and others;
- e. communicate with You if you request information, offers and promotions offered by Integra and solicit Your feedback, or keep You up-to-date on Integra and Our products; and to
- f. personalise Your experience using Our Services, provide content recommendations and serve relevant advertisements contracted by event organisers.

9. How We Share Your Information

9.1 We will not sell Your personal information.

9.2 We do share information about You in the limited circumstances and with appropriate safeguards on Your privacy.

9.3 Subsidiaries, Employees, and Independent Contractors: We may disclose information about You to Our subsidiaries, Our employees, and individuals who are Our independent contractors (sub-contractors) that need to know the information in order to help us provide Our services or to process the information on Our behalf.

9.4 Third Party Suppliers: We may share information about You with third party suppliers who need to know information about You in order to provide their services to us. For example – to payment providers like PayPal or analytics providers like Google.

9.5 As Required by Law: We may disclose information about You in response to a court order, or other governmental request.

9.6 To Protect Rights and Property: We may disclose information about You when We believe in good faith that disclosure is reasonably necessary to protect the property or rights of Integra, Clients, third parties, or the public at large. For example, if We have a good faith

belief that there is an imminent danger of death or serious physical injury, then We may disclose information.

9.7 Business Transfers: In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that Integra goes out of business or enters bankruptcy, User information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Notice would continue to apply and You can revised and change Your privacy choices at any time.

9.8 Aggregated and De-Identified Information: We may share information that has been aggregated or reasonably de-identified / anonymised, so that the information could not reasonably be used to identify You. For instance, We may publish aggregate statistics about the use of Our services.

9.9 With Your Consent: We may share and disclose information with Your consent or at Your direction. For example - where the Client wants to offer You products like accommodation via a sub-contractor.

9.10 International transfers of your personal data: There are the circumstances in which Your information may need to be transferred to countries outside the European Union (EU) and/or European Economic Area (EEA) they are:

- a. where You enter into a contract with an event organiser who is located outside the EU / EEA, Our Clients are required to have a compliant GDPR privacy notice, to agree to GDPR standards when handling Your personal data and to fulfil their obligations under GDPR;
- b. where Your event organiser / the Client is located outside the EU / EEA, but in a country that is recognised by the EU Commission as having an adequate level of protection; and
- c. where You submit personal data for publication, through Our website or services, Your data may be available on the internet around the world. For example - a biography or programme. We cannot prevent the use (or misuse) of such personal data by others.

9.11 Whenever We transfer Your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least of one of the following safeguards is implemented:

- a. we will only transfer Your personal data to countries that have been deemed to provide adequate level of protection for personal data by the European Commission; and/or
- b. when We use a certain service provider, We may use specific contracts approved by the European Commission which gives personal data the same protection it has in Europe; and/or
- c. where We use providers based in the US, We may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

9.12 Please contact Us if You want further information on the specific mechanism used by Us when transferring Your personal data out of the EEA.

9.13 Information Shared Publicly

9.14 Information that You choose to make public. For example – on Your public profile, posts, other content that You make public on Your own website, in reviews or on social media. Search engines used by third parties, usually index public information. Please keep all of this in mind when deciding what You would like to share or make public.

10. Your Rights and Choices

10.1 You have several free of charge choices available when it comes to information about you:

- a. you have the right to correct any of Your stored personal data;
- b. you have the right to make a **subject access request (SAR)** to get a copy of all Your stored personal data;
- c. you have the right to restrict personal data;
- d. you have the right to object to processing of personal data;
- e. you have the right not to be the subject of automated decision taking including profiling;
- f. you have the right to request erasure of Your personal data;
- g. you have the right to request transfer of Your personal data; and
- h. you have the right to withdraw consent.

10.2 How to exercise Your Rights:

- a. Log into Your User account.
- b. Navigate to “My Account” on Your personal dashboard.
- c. You can view and edit most data stored.
- d. You can activate a **SAR** from “My Account” “Privacy” or send an email to Your event organiser.
- e. Integra will arrange to supply this information within one calendar month.
- f. Notification of the responses to requests are sent by email to You.
- g. To protect your privacy and data you will need to log into Your User Account to access responses.

10.3 You can ask by sending an email to your **Data Controller**, probably Our Client the event organiser with regards to:

- a. the purpose of any data processed about You;
- b. what categories of data are processed;
- c. who is Your data sent to;
- d. how long will Your data be retained or criteria used to determine that period;
- e. where did the data come from if not collected from You; or
- f. for a copy of Your data stored by Our Clients.

10.4 You have the right to be forgotten when: Your personal data is no longer necessary for the purpose that it was originally supplied or You want to withdraw consent or object for us to process Your data.

10.5 You can delete your Data by [contacting us](#), We will erase any personal information and anonymise any data We hold about how You have used Integra. We do not delete the data You shared with Integra for reasons that are not connected with Your Integra account. For example- feedback or support. Data relating to any payments, as this data may need to be retained for accounting, tax or legal reasons.

10.6 How long will Integra keep my information? The Client tells us how long to keep Your data, which will be as long as is necessary for the relevant activity, or as long as is set out in the contract with the Client.

10.7 Limit the Information that You Provide: The Client decides on mandatory fields in Integra, if You choose not to provide optional data some service features may not be accessible to You.

10.8 Limit Access to Information on Your Mobile Device: if You choose to restrict or block Our access to Your stored data, information or mobile location, some service features may not be accessible to You.

10.9 Opting Out of Electronic Communications: Even if You once opted into receiving promotional messages, You can opt out at any time. Just follow the instructions in those messages. If You opt out of promotional messages, We may still send You other messages, like those about Your account and legal notices.

11. Other things you might want to know

11.1 Data breaches: If, despite the security measures We take to protect Your personal data, a breach of security occurs, We will deal with the security breach effectively and promptly, contacting Our Client and following the procedure set out in Our breach-management plan.

11.2 Children's Privacy: Integra does not supply services to anyone under the age of 16 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 16. If You hold parental responsibility for the child and You are aware that Your Child has provided us with personal data, please contact us. If We become

aware that We have collected personal data from children without verification of parental consent, We will take steps to remove that information from Our servers.

- a. If Our Client contracts with us to process children’s personal data then We will think about the need to protect them from the outset, and design Our systems and processes with this in mind. Children need particular protection when collecting and processing their personal data because they may be less aware of the risks involved.
- b. Compliance with the data protection principles and in particular fairness is central to all our processing of children’s personal data. We will establish that there is a lawful basis for processing a child’s personal data. Consent is one possible lawful basis for processing, but sometimes We may use an alternative basis as being more appropriate and provides better protection for the child.
- c. When offering an online service directly to a child, only children aged 13 or over are able provide their own consent. For children under this age you need to get consent from whoever holds parental responsibility for the child.
- d. Children merit specific protection if We use their personal data for marketing purposes or creating personality or User profiles. We will not usually make decisions based solely on automated processing about children if this will have a legal or similarly significant effect on them.
- e. Children need to understand what will happen to their personal data, and what rights they have. Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased.
- f. An individual’s right to erasure is particularly relevant if they gave their consent to processing when they were a child. As a matter of good practice, we will consider children’s views when designing our processing.

12. Your Right to Complain

12.1 You have the right to complain to a Data Protection Authority about Our collection and use of Your personal data. For more information, please contact your local data protection authority in the European Economic Area (EEA). For the UK contact the [Information Commissioner Office](#).

13. More Information

13.1 If you have any questions, queries or request please [contact Integra](#)

Email: support@integraplanner.com

mail: Integra Planner, GALA Choruses I, Inc, P.O. Box 99998, Pittsburgh, PA, 15233

14. Cookies

14.1 Information about our use of cookies

- a. Integra websites, in common with most websites, use cookies, which are data stored on your computer by your browser to remember information and to improve your experience. This page describes what information they gather and how We use it. You can also prevent these cookies from being stored; however, this may downgrade or 'break' certain elements of the site's functionality.

14.2 What are cookies?

- a. A cookie is a small file of letters and numbers that We store on your browser or the hard drive of Your computer if You agree. Cookies contain information that is transferred to Your computer's hard drive.
- b. For more general information on cookies, see the [Information Commissioner's Office website](#).

14.3 Essential and Non-Essential Cookies

14.4 Essential cookies are cookies that are used either solely to carry out or facilitate the transmission of communication over a network or strictly necessary to provide an online service which You have requested.

14.5 Non-essential cookies are cookies that do not fall within the definition of essential cookies, such as cookies that analyse your behaviour on a website.

14.6 We use the following essential cookie:

- a. **Strictly necessary cookies.** These are cookies that are required for the operation of Our website. They include, for example, cookies that enable You to log into secure areas of our website. These cookies are essential for the operation of Our website and do not store any personal data.

14.7 We may use the following non-essential cookies:

- a. **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around Our website when they are using it. This helps us to improve the way Our website works, for example, by ensuring that Users are finding what they are looking for easily. If these cookies are turned off We are unable to monitor the performance of Our website.
- b. **Session and persistent cookies**

14.8 Cookies can be classified as either session or persistent, depending on how long they last after they are placed on Your browser.

14.9 Session cookies last for as long as You keep your browser open and expire when You close the browser.

14.10 Persistent cookies expire at a fixed point in time or if You manually delete them from Your browser, whichever occurs first.

14.11 First and third party cookies

- a. Cookies can be classified as first party or third party.

- b. First party cookies are cookies placed on Your device by Our website domain.
- c. Third party cookies are cookies placed on Your device by third party website domains.

14.12 Third Party Cookies

- a. In some special cases, We also use cookies provided by trusted third parties. For example - We use Google Analytics, which is one of the most widespread and trusted analytics solutions on the web, it helps us to understand how You use the site and ways that We can improve Your experience. These cookies may track things such as how long you spend on the site and the pages that you visit.
- b. For more information on Google Analytics cookies, see the official Google Analytics page.

14.13 How Secure are Cookies?

- a. Cookies do not in themselves present a threat to privacy, since they can only be used to store information that the User has volunteered or that the web server already has. Whilst it is possible that this information could be made available to specific third party websites, this is no worse than storing it in a central database.

14.14 How to accept or reject cookies

14.15 There are a number of different ways in which You can accept or reject some or all cookies. You are also able to withdraw Your consent at any time. Some of the main methods of doing so are described below.

14.16 You are welcome to block the use of some or all of the cookies We use on Our Website. However, please be aware that doing so may impair Our website and its functionality or may even render some or all of it unusable.

14.17 You should also be aware that clearing all cookies from Your browser will also delete any cookies that are storing your preferences, for example, whether You have accepted cookies on a website or any cookies that are blocking other cookies.

14.18 You can accept or reject some or all cookies (for example, blocking all third party cookies) by adjusting Your browser settings. If You do not know how to do this, the links below set out information about how to change Your browser settings for some of the most commonly used web browsers:

- a. Google Chrome
<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>
- b. Mozilla Firefox
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- c. Microsoft Internet Explorer
<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

d. Apple Safari - https://support.apple.com/kb/ph21411?locale=en_GB

14.19 To clear cookies that have previously been placed on Your browser, You should select the option to clear your browsing history and ensure that the option to delete or clear cookies is included when You do so.

End of Privacy and Cookies Notice – Version 2022

Compatibility - this Policy affords everyone the same rights and is compatible with:

- a. The California Online Privacy Protection Act (CalOPPA) for Californian residents.
- b. The Personal Information Protection and Electronic Documents Act (PIPEDA) for Canadian residents.