



Privacy Notice

International Galleries Alliance – Website Privacy Notice for Clients/ Website users
Last updated 20 December 2021

Your privacy is important to International Galleries Alliance (IGA). This privacy notice is provided in a layered format so you can click through to the specific areas set out below. If you have any questions please feel free to contact us using the details included at [section 16](#)

1–Purpose of this Privacy Notice

This privacy notice describes how IGA will collect and use the personal information that you provide to us when you use this site, www.international-galleries-alliance.org (“the Site”), including when you purchase products via the Site or sign up to receive communications from IGA. It also applies to a limited number of other circumstances where we collect and use your personal information, for instance, when you apply for a job with us or send us an enquiry. These are described in more detail in section 3.

It is important that you read this privacy notice together with any other privacy notice that we have provided or may provide to you when we are collecting or processing personal information about you in other contexts, for instance if you are also an IGA Member you will be provided with a separate members’ privacy notice. This privacy notice supplements any other such notices.

In this notice, references to “we” or “us” are to IGA and references to the GDPR are to the General Data Protection Regulation (EU 2016/679) including the GDPR as it is implemented into UK law.

2–Who we are

IGA is a charitable company (Company No. 13158353) and is the controller in respect of personal information processed about you, as described in this privacy notice.

IGA’s registered office in the UK is at 10 Queen Street Place, London EC4R 1BE.

3–When do we collect personal information about you?

We will collect personal information about you:

- 3.1 when you use the Site as a visitor;
- 3.2 when we undertake due diligence or compliance checks about you due to our obligations under Anti-Money Laundering Regulations, such as when you enquire about making a purchase via the Site;
- 3.3 when you make a purchase via the Site;
- 3.4 when you contact us directly to make an enquiry (including to request information) or to make a complaint;
- 3.5 when you sign up to receive our newsletters, topic updates and event invites;
- 3.6 when we undertake due diligence about you to assist us to establish and maintain relationships which we believe are in the best interests of IGA, such as when you make, or enquire about making, a purchase via the Site;

4–What personal information do we use?

We may collect, store and otherwise process the following kinds of personal information about you:

When you sign up to our newsletter

your full name and contact details, including email address;

4.1 details of any correspondence that you send to us;

When you sign up for a registered account on the Site

4.2 details of any identification documents should this be required for verification under Anti-Money Laundering Regulations;

4.3 details of any username and password that you will use to access your account;

4.4 details of your VIP status if you are given VIP status on the Site.

When you make a purchase via the Site

4.5 your financial and payment details; and

4.6 details of your purchase history and any interests/ preferences that you have expressed.

When you navigate our website

4.7 Please see our cookie notice for more details.

5–What about personal information that is considered more sensitive?

We will only collect and use sensitive information (also known as special category data under the GDPR) if there is a valid reason for doing so and where the law allows us to. Sensitive information includes personal information about health, ethnicity, religion, political opinions or sexuality. For instance, information that you provide to us about your health is sensitive information.

We request that you avoid disclosing to us any sensitive information relating to you or anyone else when providing us with personal information, except where that information has been requested.

When we collect sensitive information or criminal conviction data about you and we are required to tell you what our lawful basis is for doing so, we will set this out.

6–How we use your personal information

IGA will use your personal information for a variety of purposes:

We will use your contact details:

- (a) if you make, or enquire about making any purchases via the Site, to correspond with you about such purchases;
- (b) to send you communications about new products, events or services that we think you may be interested in hearing about;
- (c) to contact you to send you our newsletter where you have subscribed to receive such communications from us online;
- (d) to satisfy legal obligations which are binding on us;

We will use your financial details:

- (e) if you make any purchases through the Site, to process your payments and administer your purchases.

7–Lawful grounds

Under the GDPR, we are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

Legitimate interests

7.1 We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests and the use of your personal information is fair, balanced and does not unduly impact your rights. For instance, it is in our legitimate interest to sell art to you via the Site.

Performance of a contract

7.2 We may rely on this basis where it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to you entering into a contract.

Consent

7.3 We may obtain your consent to use your personal information in certain circumstances e.g. to send you direct marketing messages by email or where you have voluntarily provided us with your sensitive information. We will ensure that when we obtain your consent you are free both to give it and to decline to give it. Additionally, you may always withdraw your consent at any time without any further detriment to you.

8–Do we share your personal information?

IGA will not sell, rent or lease the personal information that you provide to us with third parties. However, we may ask third party processors to assist us and we may disclose your personal information to selected third party processors (such as agents or sub-contractors) for the purposes outlined at section 6. The third party in question will be obligated to use any personal information they receive in accordance with our instructions.

We may also engage third parties to assist us with website hosting, data analysis, transaction processing and other administrative services.

We reserve the right to disclose your personal information to third parties:

- (a) in the event that we acquire or dispose of any business or assets, in which case we will disclose your personal information to the prospective transferor or transferee of such business or assets;
- (b) if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- (c) for auditing purposes;
- (d) if we are under any legal or regulatory obligation to do so e.g. to comply with legal process or requests from government authorities;
- (e) to permit us to pursue available remedies or limit the damages that we may sustain; and
- (f) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our or a third party’s legal rights.

9–International Data Transfers

Where your personal information is transferred, stored, and/or otherwise processed outside the UK or EU in a country which does not offer an equivalent standard of protection to the UK or EU, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as relying on standard contractual clauses approved by the UK Government or European Commission as appropriate) designed to protect your personal information.

Please note that the Site is open to international clients from all over the world and that accordingly personal information associated with clients interested in products for sale on the Site will be accessible to sellers when you indicate you are interested in their product.

If you have any questions about the transfer of your personal information, please contact us using the details at [section 16](#).

10–Securing your personal information

IGA takes appropriate technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We restrict access to those who have a need to know and we train staff in handling the information securely. IGA will store all the personal information you provide on secure servers. Unfortunately there is no such thing as perfect security in the online environment. As a result we cannot and do not guarantee the security of any information you transmit to us through or in connection with the website.

11–How long do we keep your personal information?

We will keep your personal information for as long as necessary:

- (a) to comply with any statutory or regulatory requirements we are subject to under applicable law;
- (b) to fulfil the purposes for which the personal information was collected; and
- (c) to defend our or a third party’s legal rights.

Please note that where you unsubscribe from our email distribution list, we will keep a record of your details to ensure we do not send you marketing emails in future.

We will usually only retain your personal information for a maximum period of six (6) years after our last contact with you. However, if you have any questions about the retention periods for holding your personal information, please contact us using the details at section 16 below.

12–Your rights and preferences

Please note that we will honour your requests to exercise your rights to the extent possible and required under applicable law. Certain of these rights may only be available to you if you are located in the UK or the EU when you access our website or otherwise engage with us.

You have the right to:

(a) Ask us for confirmation of what personal information we hold about you, and to request a copy of that information. If we are satisfied that you have a legal entitlement to see this personal information, and we are able to confirm your identity, we will provide you with this personal information.

(b) Withdraw your consent at any time if we have relied on consent as the lawful ground to use your personal information.

(c) Request that we delete the personal information we hold about you, as far as we are legally required to do so.

(d) Ask that we correct any personal information that we hold about you which you believe to be inaccurate.

(e) Object to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for statistical purposes.

(f) Ask for the provision of your personal information in a machine-readable format to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means.

(g) Ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate use.

Please note that you also have the right to lodge a complaint with your local data protection authority about how we use your personal information if you are located in the UK or the EU. In the UK, this is the Information Commissioner’s Office. Please always consider raising your concern with us first by contacting us using the contact details in section [16 below](#).

13–Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. For more information on how we use cookies on the Site, please see our Cookies Notice.

14–Other websites

14.1 The Site contains links to other websites. Please note that when you click on one of these links, you are entering another website for which IGA has no responsibility. We encourage you to read the privacy notices on all such sites as their policies may be different than ours.

14.2 The Site may also include integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share information or you otherwise interact with social media features on the Site, those social media companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public. Your interactions with third-party social media companies and the use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to read the privacy policies for any social media accounts you create and use.

15–Updating this privacy notice

IGA may update this privacy notice by posting a new version on our website. If we update this privacy notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention where reasonably possible. Otherwise, we recommend that you periodically review this privacy notice to be aware of any other revisions.

16–How to contact us

IGA’s Company Secretary is responsible for monitoring compliance with relevant legislation in relation to personal information. You can also contact the Company Secretary if you have any questions about this privacy notice or our treatment of your personal information:

Email: naomi@international-galleries-alliance.org

Post: 2/1, 251 Kenmure Street, Glasgow, G41 2JG

Version 1.0