

Title: Privacy and Cookies Policy	Document version: 2.01
Prepared by Maria Trevis, Theatre Manager	Date prepared: September 2020
Reviewed by: Progress Theatre Board of Trustees	Date to be reviewed: 7 February 2023
Approved by: Progress Theatre Board of Trustees	Date approved: 7 February 2021

ABOUT THIS POLICY

The main purpose of this policy is to provide clear information about how Progress Theatre handles all customer data in the organisation's possession. Progress Theatre is committed to ensuring the protection of personal information and aims to provide transparency about what data they hold, for what purpose it will be used, and how we keep it secure. Progress Theatre will use information we collect about our customers in accordance with the General Data Protection Regulation 2018 and the Privacy and Electronic Communications regulations. The seven key principles of GDPR set out below lie at the heart of how we process data:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability.

WHO DOES THIS POLICY APPLY TO?

This policy applies to anyone working or volunteering for and on behalf of the Progress Theatre. This includes employees, freelancers, suppliers, volunteers (members), and trustees.

ABOUT PROGRESS THEATRE

Progress Theatre is a Charitable Incorporated Organisation (CIO), charity registration number 1182798. Progress Theatre receives some funding from trusts and foundations, individual members, donors and supporters. The rest of our income comes from ticket sales. We have one employee.

WHAT DATA WE HOLD

What information do we collect?

Examples of personal data you give us:

Buying Tickets

You give us your personal data when you buy a ticket or hire the venue, sign up for our newsletter, make a donation or gift-aid declaration or communicate with us. This may include information such as contact details and transaction information.

We maintain a record of your transaction history, but we never store your card number (although we may keep a note of the last four digits to help us identify transactions). We do not keep any details of your transactions on our servers. This is held by a third party with our authorisation and we check their procedures are in compliance with the General Data Protection Regulation 2018.

Email, Web Activity and Social Media

We keep a record of the emails we send you, and we may track whether you receive or open them so we can make sure we are sending you the most relevant information. We may then track any subsequent actions online, such as buying a ticket.

Like most websites, we receive and store certain details whenever you use the Progress Theatre 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.

You can browse our website anonymously, without giving us any data.

Your IP address is recorded in our logs on each visit to our website. As clarified below, we use this data to track the performance of the website and make improvements for the future.

Further details about our Cookie Usage can be found in this policy.

We use social media to broadcast messages and updates about events and news. On occasion we may reply to comments or questions you make to us on social media platforms. You may also see adverts from us on social media that are tailored to your interests. Depending on your settings or the privacy policies of social media and messaging services like Facebook, LinkedIn or Twitter, you might give third parties (like Progress Theatre) permission to access information from those accounts or services.

Employees and Members' Personal Data

Personal data for employees and members is submitted as part of employment or membership procedures respectively.

A record of your contact details and membership history is maintained by Progress Theatre. Membership contact details, payment and membership history are also held by a third party (Membermojo) with your authorisation and we check their procedures are in compliance with the General Data Protection Regulation 2018.

CCTV

Progress Theatre operates CCTV outside our building with the purpose of reducing the threat of crime, protecting Progress Theatre's premises and helping to ensure the safety of all our volunteers and visitors, consistent with respect for the individuals' privacy. The CCTV records video and images, and is stored for up to one month.

Photography

Part of being a member in a production or as an audience member during your visit to our venue we may take publicity photographs in our foyers or auditoria for promotional purposes. These may be used in press releases, our website, social media or brochure. We will ensure that appropriate notices are in place to make you aware of this at the time.

If you see an existing image of yourself that you would prefer us not to continue using, then please do get in touch with the Data Protection Officer.

Special Category Data - Sensitive Personal Data

Special Category Data (SCD) is collected by Progress Theatre for the purpose of employment and safeguarding. For example health information of young people in case of emergencies or for youth leader and employee DBS checks.

Special Category Data is afforded and has protection under UK legislation. We comply fully with this legislation. General Data Protection Regulation 2018.

Information Available Publicly

Any reference to a living person is done so by consent of the person. Any other data is anonymised before being made publicly available.

WHAT LAWFUL BASIS DO WE USE FOR HANDLING PERSONAL DATA?

Progress Theatre uses a **consensual** lawful basis when processing data for individuals who opt-in to our mailing lists, you can opt-out of these mailing lists at any time through any email communications or by contacting the marketing team marketing@progresstheatre.co.uk.

Progress Theatre uses a **contractual** lawful basis for processing data belonging to any of our employees or contractors, our patrons when contacting them regarding ticket sales.

Progress Theatre uses a **legitimate interest** lawful basis when processing members' personal data.

Sharing your data with Third Parties

The data we supply to third parties is done so under the contractual obligations of certain activities such as ticket processing, gift donations and sponsorship and are fully protected by Non-Disclosure Agreements. Progress Theatre does not sell personal data to third parties.

How long do we keep your data?

We will keep your information only for as long as is reasonably necessary for the purposes set out in this Privacy Policy and to fulfil our legal obligations. We will not keep more information than we need.

The retention period will vary according to the purpose, for example if purchasing a ticket only, we will typically keep your data for up to seven years from the date of your last transaction whereas, if you pledged a legacy to Progress Theatre, we will hold your details until notified by your executors. For further information about how long we will keep your information, please contact the Data Protection Officer using the contact details outlined in this policy.

Data type	Retention period
Employment applications	1yr
Personnel records, PAYE etc	6yrs
Membership contact details	1yr following lapse of membership unless lawful basis to store for longer.
DBS reference number and name only.	1Yr.
Gift Aid Declarations	6 calendar years after last gift claimed on the declaration
H&S Accident book	Minimum of 3yrs
H&S Hazardous substance tests	5yrs
Accounting records	7yrs
Grant applications and documentation	4yrs depending on funders agreements
Contracts and agreements	6yrs
Trustee board minutes	10yrs
Property - leases	12yrs
Employee Liability Insurance	20yrs
Management Minutes	10yrs

Children's privacy protection

We do not directly market to children. Enhanced protection is afforded to children through our **Safeguarding Policy** found on our website. Emergency contact and health information is collected in connection with children's activities.

Where your data is processed and stored

We use third parties - specifically MailChimp, Membermojo and TicketSource - to collect and manage data on our behalf. We only use third parties whose privacy policies are compatible with our own as well as with UK and EU law.

How we protect your data and keep it secure

Any information is restricted to the essential user and secured through the use of passwords, encryption and firewalls.

Do we pass your information to outside parties?

No. We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information other than those third parties specified in the 'Where your data is processed and stored' section above.

USE OF COOKIES

Progress Theatre is committed to protecting you and any data that we collect about you online. This section tells you how we use cookies, why, and how this allows us to improve our service. It also tells you how you can manage cookies stored on your computer or device.

Our website is hosted by Linode.com.

By using our website you agree that this Cookies Policy applies along with any other terms and conditions which may apply.

We reserve the right to make changes to our Cookies Policy which become effective immediately. Your continued use of our website means that you agree to any such changes.

What are Cookies?

Cookies are small files that a site or its service provider transfers to your computer through your web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We employ the widely-used tool, Google Analytics.

You can disable cookies in your web browser. For more information see aboutcookies.org.uk.

Following a link to other websites

If you go to another website via the Progress Theatre site or social media channels, read the privacy policy on that website to find out what it does with your information. Progress Theatre accepts no liability for the content or information on any external websites.

YOUR RIGHTS

You have the right to withdraw consent at any time. You have a 'right to be forgotten' so you can ask for your personal information to be deleted where:

- It is no longer needed for the reason why it was collected in the first place
- You have removed your consent for us to use your information and we do not have to keep your information for legal reasons.

If we have shared your personal information with others, we will do what we can to make sure those using your personal information comply with your request for erasure.

We may not be able to delete your personal data if it is needed for legal reasons, for reasons of public health, public interest or for medical purposes.

You have the right to request a copy of personal information held about you.

The right to request that inaccuracies be corrected.

The right to request us to stop processing your personal data.

The right to lodge a complaint with the Information Commissioner's Officer
www.ico.org.uk/concerns

REQUESTS, CONTACT DETAILS AND FURTHER INFORMATION

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Data Protection Officer (DPO) - Alex McCubbin, Secretary

Progress Theatre, The Mount, Reading, RG1 5HL.

secretary@progresstheatre.co.uk

For access requests, to contact us or make a complaint, please contact:

secretary@progresstheatre.co.uk

Data Protection Officer (DPO), Progress Theatre, The Mount, Reading, RG1 5HL.

You can also make a complaint to the Information Commissioner, who is an independent regulator www.ico.org.uk

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

The process for dealing with breaches of personal data

If there is a breach please contact the Data Protection Officer in the organisation, they will take action on behalf of Progress Theatre. This may include contacting the ICO, contacting the individuals concerned and taking any further action necessary to secure the data and prevent any further breaches.

Changes to our Privacy Policy

This policy will be reviewed biannually.

The previous privacy policy was modified on 8 April 2018.