

Bournemouth Little Theatre
11 Jameson Road
Bournemouth
BH9 2QD

Email: <u>bournemouthlittletheatre@gmail.com</u> www.bournemouthlittletheatre.co.uk

Privacy Policy

Bournemouth Little Theatre is a company registered in England and Wales as Bournemouth Little Theatre Club Ltd (Company Registration Number 2699332. Registered as a Charity, number 1019571.

This Privacy Policy sets out the basis on which any personal data we collect from you or that you provide to us will be processed by us. Please read the following Privacy Policy to understand how we use and protect the information that you provide to us.

Bournemouth Little Theatre respects your privacy and is committed to protecting your personal data. It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

1. Contacting Bournemouth Little Theatre

For the purpose of UK Data Protection laws, the data controller in respect of any personal data we collect about you or which you provide to us is Bournemouth Little Theatre Club Ltd. If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy, our contact details are as follows:

Bournemouth Little Theatre Club Ltd 11 Jameson Road Bournemouth Dorset BH9 2QD

Email: bournemouthlittletheatre@gmail.com

2. Data that we collect about you

2.1 We may collect, use, store and transfer different kinds of personal data about you which we have explained using the following categories:

- Identity Data includes first name, last name, images of you and Twitter handles.
- Contact Data includes home address, telephone numbers, email address, billing contact details and billing address.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

2.2 We may receive information that you submit to any third-party website that you access from a link contained in this website. Both Bournemouth Little Theatre and the owner or operator of that third-party website will be the data controller in respect of any such information, and you should check the privacy policy of that website to find out how they will use your data. We will only use that information in

accordance with this Privacy Policy.

2.3 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you) for example, to provide you with services). Ion this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How we collect your data

Generally, we collect your information when you decide to interact with us. We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
 - o Technical Data from analytics providers such as Google based outside the EU.
 - Search information providers such as Companies House and the DeHavilland monitoring service.

4. Use your Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have specifically consented to our use of the personal data, for example to sending direct marketing communications to you via email. You have the right to withdraw your consent to marketing at any time by contact us.

5. Purposes for which we will use your personal data

We have set out in the table below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data:

Data Used and Purpose	Lawful basis for processing, including basis of legitimate interest
To register you as a new member we use your identity, contact, financial and transaction Data.	Performance of a contract with you.
To register you as a new website user we use your identity and contact Data.	Performance of a contract with you.
To register you as a participant in our mentoring scheme we use your identity, contact and Profile Data.	Performance of a contract with you.
To process and deliver your event booking including:	a) Performance of a contract with you.

 a) Managing payments, fees and charges. b) Collect and recover money owed to us. c) Sending you information about the event we use your identity, contact, financial transaction and Marketing Communication Data. 	b) Necessary for our legitimate interests (to recover debts due to us).
To maintain and manager your membership with us including: a) Managing payments, fees and charges. b) Collect and recover money owed to us	a) Performance of a contract with you. b) Necessary for our legitimate interests (to recover debts due to us).
we use your identity, contact, financial transaction and Marketing Communication Data.	
To manage our relationship with you including: a) Notifying you about changes to our terms and conditions or Privacy Policy. b) Asking you leave a review or take a survey and, in addition, for Members. c) Sending member communications such as, depending on your membership grade, Member Newsletters, Box Office Sales Data Reports, Legal and Employment Relations updates, Training and Events news. d) Informing you of reports, consultations, guidelines and industry advocacy. e) Informing you of Bournemouth Little Theatre events. f) Providing you with sector updates which we think will be of interest to you. We use your identity, contact, Profile and Marketing and Communications Data.	 a) Performance of a contract with you. b) Necessary to comply with a legal obligation. c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services). d) Necessary for our legitimate interests of keeping our members informed of trends and news in the theatre industry and of the work we are doing for members.
To include you in our Bournemouth Little Theatre Directory of Members: We use your identity and Contact Data.	Performance of a contract with you.
If you are a member or have attended an event or used our mentoring scheme, to enable you to partake in a prize draw, competition or complete a survey, we use your identity, contact, profile, usage and marketing Communications Data.	a) Performance of a contract with you. b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To publicise our events (including by way of images or sound recordings of you when you have attended our events) we use your identity data.	 a) Performance of a contract with you (as a core purpose of our events is to facilitate networking so delegate name and organisation are circulated amongst delegates on the web, with speakers and sponsors). b) Necessary for our legitimate interests to promote our events and our work and grow our business.
To share online resources for our events, eg by way of a secure forum we use your identity data.	Necessary for our legitimate interests to run our events.
To administer and protect our business and this website (including troubleshooting, data analysis,	a) Necessary for our legitimate interests (for running our business, provision of

testing system maintenance, support, reporting and hosting of data) we use your identity, contact and technical data.	administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). b) Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you we use your identity, contact, profile, usage, technical and marketing and communications data.	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences we use your technical and usage data.	Necessary for our legitimate interests (to define types of customers for our products/services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you we use your identity, contact, technical, profile and usage data.	Necessary for our legitimate interests (to develop our products/services and grow our business).
To provide members with data on weekly figures at venues across our membership we use your identity data.	Necessary for our legitimate interests (to provide our membership with useful industry data).
If you are not a member of Bournemouth Little Theatre Club, to make suggestions and recommendations to you about training and events that may of interest to you we use your identity, contact, technical, profile and usage data.	We will only send such information to you when you have specifically consented to receive the information via our website sign up page.
To manage our relationship with you if you are a course tutor or any of our Bournemouth Little Theatre events, we use your identity and contact data.	Performance of a contract with you and legitimate interests of running events at Bournemouth Little Theatre.
To manage our relationship with you if you are contracted to provide services to Bournemouth Little Theatre, we use your identity, contact, financial and transaction data.	Performance of a contract with you and necessary for our legitimate interests (of running our business).

6. Disclosure of your personal data

- **6.1** Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your express opt-in consent.
- **6.2** We may disclose your personal information to any person to whom disclosure is necessary to enable us to enforce our rights under this **Privacy Policy** or under the **Terms and Conditions** or under our membership contract with you. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the optout links on any marketing message sent to your or, in respect of messages from us by **contacting us**.

8. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Please see our Cookies Policy for information on how we use cookies on our website.

9. Third Party Sites

Our website may contain links to websites, plug-ins and applications that are operated by third parties. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control those websites and this Privacy Policy does not apply to those websites. Please consult the terms and conditions and privacy policy of those third-party websites to find out how they collect and use your personal data and to establish whether and for what purpose they use cookies.

10. Data Security

- 10.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or access in an unauthorised way, altered or disclosed, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. However, you acknowledge that data transmission over the internet is inherently insecure and that we cannot guarantee the security of data sent over the internet.
- **10.2** We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Storing your data

- **11.1** We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.
- 11.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purpose for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.
- 11.3 Your information will only be held for a reasonable period or as long as the law requires or permits.

12. Third Party Processors

- **12.1** The information that you provide to us will be collected and processed on our behalf Ticketsource. For the avoidance of doubt, we may also have access to this information.
- **12.2** We may also share your information with service providers who work on behalf of Bournemouth Little Theatre for the performance of any contract we enter into with them or you, for example payment processing, printers and mailing houses, marketing agencies, database services, website hosting or email delivery service.

13. International Data Transfers

- **13.1** Your personal data may be transferred, processed and/or stored by us or our processors outside the European Economic Area (specifically the USA). By submitting your personal data, you agree to such transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- **13.2** Some countries outside the EEA do not have laws that protect your privacy rights as extensively as those in the UK. However, if we do transfer your personal data out of the EEA, we put in place appropriate safeguards to ensure that your personal data is properly protected and processed in accordance with this Privacy Policy. These safeguards include imposing contract obligations of adequacy or requiring the recipient to subscribe to or be certified with an 'international framework' of protection.
- **13.3** Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data out of the EEA.

14. Your Rights

14.1 Under certain circumstances you have rights under the UK data protection law in relation to your personal data as set out below. If you wish to exercise any such right in the appropriate circumstances, please contact using the information provided above:

Request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data event if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **14.2** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- **14.3** We may need to request specific information from you to help us to confirm your identity and ensure your rights to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- **14.4** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

15. Changes to Our Privacy Policy and Your Duty to inform us of Changes

We reserve the right to make changes to the Privacy Policy from time to time. Any such changes to our Privacy Policy will be posted on this page of our website. We recommend that you consult this page frequently so that you are aware of our latest Privacy Policy from time to time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Last updated: 22 April 2019