

Chesil Theatre **Privacy Policy**

Privacy Policy

We are committed to protecting the privacy of your personal data. Any personal data that you share with us will be kept safe and secure. We want to be clear about how and when we collect data from you and how and why we use it. This policy explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure. We would suggest that you read this privacy policy carefully to ensure that you are well informed about and understand our practices.

We may from time to time update this notice, so please do take the time to check it regularly. By using our website, you agree to be bound by this policy.

Any questions regarding this policy and our privacy practices should be sent by email to the Secretary at secretary@chesiltheatre.org.uk.

Who are we?

Chesil Theatre is an amateur theatre company with premises in Winchester. Winchester Dramatic Society trading as Chesil Theatre is a company limited by guarantee, registered in England and Wales, no. 1621492, and a UK registered charity, no. 285043. The registered address is Chesil Theatre, Chesil Street, Winchester SO23 0HU.

Accessing our site

If you are aged 13 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Access to our site is permitted on a temporary basis, and we reserve the right to withdraw or amend the service we provide on our site without notice. We will not be liable if for any reason our site is unavailable at any time or for any period. From time to time, we may restrict access to some parts of our site, or our entire site (including for members).

You are responsible for making all arrangements necessary for you to have access to our site. You are also responsible for ensuring that all persons who access our site through your internet connection are aware of these terms, and that they comply with them.

Any sensitive information (such as credit or debit card details) is encrypted and protected via a third-party provider. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Where you access guest wifi without the

need for a password, we will not retain any personal or device information shared by the device used.

Use of 'cookies'

Like many other websites, Chesil Theatre's website may use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, cookies may store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Ownership of Content

Our site and all its contents including, but not limited to, the text, the site (as well as the organisation and layout of the site), design, logos, graphics, icons and images (the "Content") are owned and copyrighted by Chesil Theatre or others (including our licensors) with all rights reserved unless otherwise stated. All trade marks, copyright, database rights, design rights, patents and other intellectual property rights (together "the Rights") in the Content that are made available for download from the site are owned by us or our licensors or are otherwise used by us as permitted by applicable law.

Except in relation to free or subscribed resources disseminated via the website, any Content that is a trademark, logo or service mark is also a registered or unregistered trademark of Chesil Theatre and/or third parties. Nothing contained in these terms of use shall be construed as conferring in any way (express or implied) any licence or right to use any Rights of the Chesil Theatre or any third party. Where the Content is owned or copyrighted by a third party, certain additional restrictions may apply. Where these apply, they will be indicated on the relevant part of this site.

Information about you and your visits to our site

We may process information about you in accordance with our Privacy Notice below. By using our site, you consent to such processing and you warrant that all data provided by you is accurate.

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Viruses, hacking and other offences

You must not misuse our site by knowingly introducing viruses, trojans, worms, logic bombs or other material which is malicious or technologically harmful. You must not attempt to gain unauthorised access to our site, our embedded content, the server on which our site is stored or any server, computer or database connected to our site. You must not attack our site via a denial-of-service attack or a distributed denial-of service attack.

By breaching this provision, you would commit a criminal offence under the Computer Misuse Act 1990.

We will not be liable for any loss or damage caused by a distributed denial-of-service attack, viruses or other technologically harmful material that may infect your computer equipment, computer programs, data or other proprietary material due to your use of our site or to your downloading of any material posted on it, or on any website linked to it.

Website analytics

Our website may be using Google Analytics. This provides information about your use of the website and is stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more details please read Google's Analytics overview.

You can always opt-out of Google Analytics cookies by using Google's opt-out tool.

Jurisdiction and applicable law

The English courts will have non-exclusive jurisdiction over any claim arising from, or related to, a visit to our site although we retain the right to bring proceedings against you for breach of these conditions in your country of residence or any other relevant country.

These terms of use and any dispute or claim arising out of or in connection with them or their subject matter or formation (including non-contractual disputes or claims) shall be governed by and construed in accordance with the law of England and Wales.

Your use of any Content, except as provided in the terms of use, without our written permission is strictly prohibited and we will enforce our intellectual property rights to the fullest extent permitted by the law.

Our site changes regularly

We aim to update our site regularly, and may change the Content at any time. Similarly, the terms in this document may vary at any time.

Privacy Notice

Chesil Theatre is the data controller in respect of all personal data collected by the charity. Data controllers are legally responsible for ensuring that personal data they obtain is processed in full compliance with the 2018 General Data Protection Regulations (GDPR). Chesil Theatre is registered as a data processor with the ICO (Information Commissioner's Office).

By using this website and/or giving personal data to us, you indicate that you consent to us using your personal data in accordance with this Privacy Notice.

What information we hold about you

Adult Members

Personal information for new adult members and for new members of the Chesil Youth Theatre is obtained via the Membership Application Forms. Adult members' personal information held usually comprises the following:

- name
- address
- contact telephone numbers (landline/mobile)
- email address
- age range (<18, 26-35, 36-45, 46-55, 56-65, 66-75, >75).
- financial details (bank sort code and account number) for Standing Order mandate

There is a confidential tick box to indicate if the applicant has any long term condition or disability that may affect ability to join in any of the theatre activities. Details of any such condition or disability can be indicated on a separate sheet of paper.

Chesil Youth Theatre Members

Personal information of Chesil Youth Theatre (CYT) members held is as follows:

- name
- age
- address
- school attended and school year
- name of parent or guardian
- email address of parent or guardian
- contact telephone numbers
- financial details of parent or guardian (bank sort code and account number) for Standing Order mandate.

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There is currently a section on which parents or guardians agree that the details of the CYT member may be held on a mailing list. Parents/guardians may opt in or opt out of the following uses of any images of CYT members:

- on displays at the theatre
- in printed and digital promotional publications including production programmes
- in images passed to the local press for promotional purposes
- on the Chesil Theatre website
- in videos of workshop performances and rehearsals.

There is a confidential tick box to indicate if the CYT member has any long term condition or disability that may affect ability to join in any of the theatre activities. Details of any such condition or disability can be indicated on a separate sheet of paper.

Additional individuals

We obtain information about you when you use our website, for example, when you contact us about performances or opportunities, to make a donation, participate in our productions or if you register to receive our newsletter. We may also collect personal information when you get in touch by phone, make a donation, or interact with us via social media. We may obtain personal data face-to-face, electronically, on paper (such as any form you complete – including any online form or application) or verbally (such as during any telephone conversations we have with you).

From time to time, in order to undertake legal due diligence or to improve the quality of interactions which you have with the charity, we may undertake limited proactive research from public sources such as Twitter or search engines.

If you or your organisation participate in a Chesil activity, we may collect data from participants about their experience. The choice is yours as to whether to provide feedback.

CCTV

There is a closed circuit television camera (CCTV) located in the lobby of the Chesil Theatre which constantly records movement of persons entering through the stage door and moving from the bar to the stage door area, including to the lavatories. A second camera monitors the main audience doors, the view including part of the audience seating. Pictures from the cameras are continuously recorded onto a disc hard drive, when the disc is full it is over-recorded. From time to time the pictures on the disc may be viewed for security purposes. The pictures are not copied, they stay on the in-house hard drive.

The machine records personal information and therefore falls within the scope of the GDPR.

Maintaining and sharing personal information

Personnel responsible for maintaining the Membership List

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The master membership list is kept and updated as a Microsoft Excel Spreadsheet by the Membership Secretary of the Chesil Theatre. A separate skills list of member's interests is also maintained by the Membership Secretary.

Application forms may be scanned by the Membership Secretary into PDF documents and retained in a folder on the Membership Secretary's desktop personal computer. This PC is equipped with up to date antiviral software (Norton 360).

After scanning, the original paper copy of the application forms are forwarded via the Chesil Theatre letterbox system to the Honorary Treasurer for processing of any Standing Order Mandates. The Hon. Treasurer keeps the original copies securely on file at his home address.

The Membership Secretary is also responsible for chasing up members who have not paid their annual membership subscriptions after the due date. Notifications are by email and may be repeated up to three times before an unpaid member is removed from the master membership list. The names of those members removed are notified to the rest of the Executive Committee (Trustees and directors of Chesil Theatre).

Sharing of Personal Information

If the member has indicated specific interests in theatre operation, the Membership Secretary will send a scanned copy of their application form by email to the appropriate Head of Department, for example if a member interested in front of house and bar work, the form is sent to the front of house and bar managers for follow up contact. New members of the 'ticket club' are also notified to the ticket sales team. Application forms of members who do not indicate any interest other than audience participation are not scanned.

From time to time and before each meeting of the Executive Committee, the Membership Secretary sends the master membership list and the skills list to members of the Committee, the ticket sales manager and the newsletter editor to update their distribution lists.

Each time the lists are circulated, the Membership Secretary informs the Executive Committee members and other recipients that the lists are confidential and must not be used for any purpose other than for theatre business and requests that all previous versions of the membership list be destroyed/deleted from personal computers.

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. We do not sell personal data. We do not transfer personal data outside of the United Kingdom.

When necessary for the safeguarding of members (not limited to, but with express note to, Chesil Youth Theatre), data may be disclosed to relevant third parties where processing is necessary for compliance with our legal obligations.

We may occasionally appoint other organisations to carry out some of the processing activities on our behalf. These may include for example, technology hosts or printing companies. In these circumstances, we will ensure that your personal data is properly protected and that it is only used in accordance with this Privacy Notice.

Keeping your data

Your data is retained for as long as is necessary for the purpose that it was collected for. We are obliged to keep certain data to fulfil certain legal obligations and matters of record keeping e.g. financial records which we are required to keep for 6 years. Any data that is retained is minimised to ensure that we are keeping only that which is required. We will securely delete all data when it is no longer required.

Individuals' rights

When the Chesil Theatre collects personal data, members are currently given certain information, such as Chesil Theatre's identity and how it intends to use their information.

Under the GDPR, members are also informed of data retention periods and their right of complaint if they think that there is a problem with the way in which Chesil Theatre is handling their data.

GDPR procedures must cover all of the rights that an individual has, including the means whereby personal data can be deleted. The GDPR includes the following rights for individuals:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

Many of the remaining rights detailed above will not be relevant to the kind of information that Chesil Theatre holds on individuals and the way in which it is held. On a practical basis, the Membership Secretary can react swiftly if someone asks to have their personal data removed from the records by deleting their entry on the master membership list and then informing the rest of the Executive Committee that this has been done.

If you would like to access the rights listed above, or any other rights over your data under current legislation, please get in touch with us.

Notwithstanding the above, we may withhold personal information that you request to the extent permitted by law.

Data Security

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Personal data is not stored anywhere other than in secure Chesil Theatre email accounts, on password-protected IT systems, in addition to those detailed above.

Where a data breach is identified and is likely to result in a high risk to the rights and freedoms of individuals, Chesil Theatre will notify those concerned directly.

Consent

The GDPR requires that consent must be freely given, specific, informed and unambiguous. There must be a positive and verifiable opt-in – consent is not inferred from silence, pre-ticked boxes or inactivity. It is separate from other terms and conditions, and there is a simple way for people to withdraw consent and to unsubscribe from future communications.

There is a separate application form page on matters relating to data protection and opt-in choices. We believe that the legal basis of consent meets the GDPR standard on being specific, clear, prominent, opt-in, properly documented and easily withdrawn.

Opt-in consent is subject to periodic renewal. Chesil Theatre membership will be advised of the new requirements via the newsletter and also by a batch email. There are a very few members still on postal distribution and these could be contacted by post and a hard copy of the consent returned and held on file.

There are already procedures in place to verify individuals' ages via the application form. Currently the Chesil Theatre does not offer online services ('information society services') to children and does not collect information about them.

Data protection impact assessments

It is envisaged that there will be no material changes in the scope of personal information gathered from adult and CYT members and that none of the statements listed below will apply:

- Will the project involve the collection of new information about individuals?
- Will the project compel individuals to provide information about themselves?
- Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
- Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
- Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
- Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
- Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.
- Will the project require you to contact individuals in ways that they may find intrusive?

Whereas Chesil Theatre recognises that the approach of privacy by design should be followed, we do not believe that it is necessary to carry out a separate Data Protection Impact Assessment (DPIA).

Data Manager

The GDPR requires Chesil Theatre to designate someone to take responsibility for data protection compliance. The appropriate person is the current Secretary. The Data Controller is Winchester Dramatic Society. You can contact us on secretary@chesiltheatre.org.uk.

Reporting concerns

If you believe that we are not processing your personal data in accordance with the law, you can complain to us at chairman@chesiltheatre.org.uk or to the Information Commissioner's Office (helpline number 0303 123 1113 or online via the ICO website: www.ico.org.uk).

Changes to this Privacy Notice

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We will ensure our website has our most up to date policy and suggest that you check this page periodically to review our latest version.

Last updated Winchester Dramatic Society (Chesil Theatre) April 2022