

Privacy Policy

PURPOSE OF THIS PRIVACY POLICY

The Yvonne Arnaud Theatre is committed to protecting your personal information and to being transparent about the information we hold about you, as well as giving you control on how we use it. Using personal information allows us to develop a better understanding of our patrons, and in turn provides you with relevant and timely information about the work that we do, both on and off stage.

The purpose of this policy is to give you a clear explanation about how we collect and process your personal information, including any data you may provide through our website and when you sign up to our newsletters, purchase a ticket or make a donation.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information. This privacy policy supplements our other policies and is not intended to override them.

We are the data controller for your personal information and we will ensure that it is used and stored in accordance with:

- The Data Protection Act (1998)
- The Privacy and Electronic Communications (EC Directive) Regulations (2003)
- The EU General Data Protection Regulation (Regulation EU 2016/679), ('GDPR'), effective from 25 May 2018

This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Information about how we keep your personal information secure, how long we maintain it for and your rights to be able to access it

If you have any questions, at any time, about this policy or the personal information we hold about you, or wish to change how you would like to hear from us, please contact us:

By email: dataprotection@yvonne-arnaud.co.uk

By post: Data Controller, Yvonne Arnaud Theatre, Millbrook, Guildford, Surrey GU1 3UX

By phone: 01483 44 00 77

WHO WE ARE

The Yvonne Arnaud Theatre group of companies manage the arts provision and support services for Guildford's Yvonne Arnaud Theatre. The Yvonne Arnaud Theatre Trust is a registered charity (number 200500) and oversees the running of The Yvonne Arnaud Theatre Management Limited. The Yvonne Arnaud Theatre Management Limited is a charitable company (limited by guarantee) both registered with the Charity Commission (number 238436) and incorporated in England and Wales (number 814453).

We receive the majority of our income from ticket sales, supplemented by venue hire, catering revenues and fundraising income from individual donations, corporate sponsorships and grants received from Trusts towards specific projects. Guildford Borough Council are valuable supporters of the work that we do through the provision of annual revenue funding.

INFORMATION WE MAY COLLECT ABOUT YOU

Personal information means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

Information you give us

When you register on our website, buy a ticket over the counter, by phone or online via our website, by signing up for one of our other events or workshops, by updating your preferences on our website or by making a donation, we will store personal information you give us such as your name, email address, postal address, billing address and telephone number. We will also store a record of your purchases and/or donations.

Information about your interactions with us

When you visit our website, we collect information about how you interact with our content. When we send you a mailing we store a record of this and in the case of emails, we keep a record of which ones you have opened and which links you have clicked on.

Information about marketing & communications preferences

This includes your preferences in receiving marketing from us and our third parties and your communication preferences. This helps us to manage our relationship with you and ensures you only receive communications from us that are relevant and timely.

Sensitive personal data

Data Protection law recognises that certain categories of personal information are more sensitive, such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about our patrons unless there is a clear reason for doing so. As an example, we may collect health information about youth theatre participants.

Information from third parties

We occasionally receive information about you from third parties as set out below:

- (a) Analytics providers such as Google
- (b) Advertising networks such as Facebook
- (c) Search information providers such as Google AdWords

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we were to combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we would treat such combined data as personal data which will be used in accordance with this privacy policy.

If you are visiting our venue we will collect your data and some information about you, so that we can take part in the NHS Test and Trace service and help prevent the spread of COVID-19. The government has asked organisations to do this in order to keep our visitors and employees safe.

You can read full details of how we will use your data for the NHS Test and Trace system at the end of this document.

LEGAL BASIS

There are three bases under which we may process your data:

- i. Contract purposes
When you make a purchase from us or make a donation to us, you are entering into a contract with the Yvonne Arnaud Theatre. In order to perform this contract, we need to process and store your data. For example, we may need to contact you by email or telephone in the case of the cancellation of a show, or in case of problems with your payment.
- ii. Legitimate business interests
In certain situations, we collect and process your personal data for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing.
- iii. With your explicit consent
For any situations where the first two bases above are not appropriate, we will instead ask for your explicit consent before using personal information in that specific situation.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information 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 a ticket). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Users under 18

We understand that people aged under 18 may use our website. If you are under 18, please ensure that you obtain your parent/guardian's consent before hand whenever you provide personal information to us. To request to see our Safeguarding Policy, please contact us, using the contact details at the end of this policy.

HOW WE MAY USE YOUR INFORMATION

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information 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 we have your explicit consent before using your personal information in that specific situation. However, generally we do not rely on consent as a legal basis for processing your personal information and you have the right to withdraw consent to marketing at any time by contacting us. You will find the relevant contact details at the end of this policy.

Marketing communication

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful and never excessive. To do this, we use data that we have stored about you, such as which events you have booked for in the past, as well as any contact preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of postal mailings, you may opt-out of receiving these at any time using the contact details at the end of this policy or by updating your contact preferences in your online account with us.

In the case of email, we will give you an opportunity to opt into receiving electronic communications during your first purchase with us, or when registering an account. If you do opt-in to receiving emails from us, we will then provide you with the option to unsubscribe in every email that we send you subsequently. Alternatively, you can use the contact details at the end of this policy or update your contact preferences in your online account with us.

As part of our service to you, we may contact you by email or telephone to provide essential information related to your purchase or visit.

Fundraising communication

Under our legitimate business interest, we may contact you by post to seek your support for our philanthropic priorities. This contact will not be more frequent than once a month and you are able to opt-out at any time by using the contact details at the end of this policy, or by updating your contact preferences in your online account with us.

Additionally, and only if you have given your consent, we may contact you by email to seek your financial support.

We may use profiling techniques or third party wealth screening and insight companies to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you.

Other processing activities

In addition to marketing and fundraising communications, we also process personal information in the following ways that are within our legitimate organisational interests.

We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.

We may analyse data that we hold about you in order to identify and prevent fraud.

In order to improve our website, we may analyse information about how you use it and the content that you interact with.

In all the above cases we will always keep your rights and interests at the forefront to ensure that they are not overridden by your own interests or fundamental rights and freedoms. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you do object, this may affect our ability to carry out tasks above that are for your benefit.

DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our service providers who process data on our behalf and on our instructions (for example our ticketing system software provider, email distribution service and mailing houses). We require all third parties to respect the privacy of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- To specific, named visiting companies whose performances you have attended. In these cases, we will always ask for your explicit consent before disclosing your personal information.
- We may share anonymised personal information with other organisations, such as The Audience Agency and UK Theatre who use this to analyse ticket sales for national and regional research into patterns of arts attendance. This assists with reporting to funders and strategic planning.

We do not sell personal details to third parties for any purpose.

SECURITY OF YOUR PERSONAL INFORMATION Cookies

A cookie is a small text file, saved onto your device, which stores small pieces of information about how you have used our site and to aid the ticket buying process. We use cookies to enable your online account and the booking process to work smoothly (for example, to keep track of your shopping basket) as well as to identify how the website is being used and what improvements we can make. For more information on Cookies and how we use them please read the Yvonne Arnaud Theatre Cookie Policy.

Your debit and credit card information

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). We never store your 3 or 4-digit security code.

Security of your personal information

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same and that they will only process your personal information on our instructions. The third parties will also be subject to a duty of confidentiality.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

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 purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as follows: -

Request access to your personal information

You have a right to request a copy of the personal information that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right or any of the rights listed below. If you are a European citizen and consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.

Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons which will be notified to you at the time of your request.

Object to processing of your personal information

You have the right to object to the 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 your personal information

You have the right to request that we 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 even 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 transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please 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.

Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. 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.

No fee usually required

You will not have to pay a fee to access your personal information (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.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

Time limit to respond

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.

NOTIFICATION OF CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time. If we make any significant changes in the way we treat your personal information, we will communicate such changes to our patrons and supporters where we have accurate contact details and where they would expect to receive communications from the Yvonne Arnaud Theatre. Please visit this section of our website periodically in order to keep up to date with changes in this privacy policy.

YOUR INFORMATION AND NHS TEST AND TRACE

To help contribute to the prevention of the spread of COVID-19, if you are visiting our venues we will collect your data and some information about you. The Government has asked organisations to do this in order to help to seek to keep you safe through NHS Test and Trace.

What do we need to know and what data will we collect?

If you are visiting our venue, we will ask you to give us the following information at the point you purchase a ticket. If you are visiting in a group, we will ask for information about one person (the lead member of the group):

- Your name
- Your telephone number and/or email address

We will also collect and record the following information:

- The date you visited us
- We will also be using the start and finish time of the event you are attending as an estimate of the times you will be arriving at, and departing from, the venue.

Why are we asking for this information?

We are collecting and processing this information so that we can open our venue. The Government guidelines ask us to do this in order to use NHS Test and Trace to reduce the risk of a further COVID-19 outbreak.

When you share your information with us, this means that NHS Test and Trace will be able to quickly identify people who have come into contact with someone who has tested positive for COVID-19. NHS Test and Trace can then ask them to act in ways that keep them and others safe.

Whose information will we collect?

We will collect this information about visitors who have bought a ticket to an event at our site, including for a performance or event in the Main Auditorium, Mill Studio, Circle Bar, Café/Restaurant or Garden.

If you are booking as a group, we will only ask for the information from the lead booker. It will then be this person's responsibility to provide the contact details for the rest of their group to NHS Track and Trace, should it be needed.

What will we do with the information?

We'll keep this information about you for these purposes for as long as it is needed for use by the NHS Test and Trace service. We won't keep it longer than it is needed for those purposes. If the information is requested by the NHS Test and Trace service, we will share it with them so they can use it for contact tracing and to investigate local outbreaks of COVID-19.

Who is processing your information?

The Yvonne Arnaud Theatre (as the data controller).

How will we use the information we hold about you?

If we are asked, we will supply the NHS Test and Trace service with the information of visitors who may have been exposed to COVID-19.

This is so the NHS Test and Trace service can:

- provide testing for anyone who has symptoms of COVID-19 to find out if they have the virus.
- contact anyone who has had a positive test result to share information about any close recent contacts they have had.
- alert those contacts, where necessary, to let them know that they need to self-isolate to help stop the spread of the virus.

Who will we share your information with?

We will share your information with the NHS Test and Trace system if NHS Test and Trace identifies a visitor to the Yvonne Arnaud Theatre who has been tested as positive for COVID-19. In this case, we will share with NHS Test and Trace contact information for our staff and any visitors who may have come into contact with the visitor who has tested positive.

If a visitor to our venue informs us that they have tested positive for COVID-19, we will contact the NHS Test and Trace service and provide them with details of staff and any visitor who may have come into contact with the visitor who has tested positive.

We will not share your information with anyone else, unless we are required to do so by law, for reasons of public safety and in risk of harm or emergency situations.

Subject to any legal requirements which we are obliged to follow, you can choose to opt out of giving your details, but we would appreciate your support to prevent the further spread of COVID-19. Please contact us at dataprotection@yvonne-arnaud.co.uk.

How long will we keep your personal information?

We will keep your contact information for 21 days so that we can respond to the NHS Test and Trace data requests. We may keep your contact details you provided when you purchased a ticket for longer than 21 days as per our standard policy for the purposes of customer record keeping.

Which laws allow us to process your personal data?

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions include:

Article 6(1)(c) – Legal Obligation in that we have a legal obligation under the Health and Safety at Work Act 1974 to ensure the safety of visitors and our staff.

Article 6(1)(f) – Legitimate Interest in that collecting the data is in the interests of the individual, the Yvonne Arnaud Theatre and the public health efforts to tackle COVID-19.

Your rights:

If you are not happy about the way your personal data is being processed you can complain directly to us by email: dataprotection@yvonne-arnaud.co.uk.

You also have the right to complain to the Information Commissioner’s Office:
Information Commissioner's Office (ICO) website.

By post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113

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.

Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us:

Email us: dataprotection@yvonne-arnaud.co.uk

Call us: 01483 440077

Write to us:

Data Controller
Yvonne Arnaud Theatre
Millbrook
Guildford
Surrey
GU1 3UX

Yvonne Arnaud Theatre Privacy Policy: effective from 17th May 2018

Updated 29th July 2020.

I,, acknowledge that on, I received and read a copy of the **Yvonne Arnaud Theatre’s** Privacy Policy and understand that I am responsible for knowing and abiding by its terms.

This Privacy Policy does not set terms or conditions of employment or form part of an employment contract.

Signed

Print Name

Date