

WEBSITE PRIVACY STATEMENT

INTRODUCTION

Welcome to the Pirton Players' privacy policy.

Pirton Players respects your privacy and is committed to protecting your Personal Data. This privacy policy will inform you as to how we look after your Personal Data when you visit our website (regardless of where you visit it from), become a member of Pirton Players, when you perform in a show or partake as an audience member or otherwise interact with Pirton Players, and tell you about your privacy rights and how the law protects you.

“**Personal Data**”, or personal information, means any information about a living individual from which that person can be identified, whether directly or indirectly. It does not include data where the identity has been completely removed (anonymous data).

This privacy statement describes how Pirton Players collects, uses, and discloses your Personal Data that we receive from you when you visit this website (<https://www.pirtonplayers.org/>), sign-up to become a member or which we otherwise receive or collect from you in the course of, or in connection with, our amateur dramatics events and performances, including if you were to visit our event premises, buy tickets ‘on the door’ and leave details.

This privacy statement is provided in a layered format so you can click through the specific areas by clicking the relevant title below.

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IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how Pirton Players collects and processes your Personal Data through your use of this website or in any other way you may interact with Pirton Players (for example such as when you become a member or attend a performance), including any data you may provide through this website when you: (a) become a member of Pirton Players through the members’ portal; (b) participate as an audience member; (c) audition for a part in a Pirton Players production; and/or (d) take part in a performance, in any capacity as a performer or in a backstage role.

This website is not intended for children and we do not knowingly collect Personal Data relating to children (i.e. those under the age of 13), without the explicit consent of a parent or legal guardian. Any parents or legal guardians of children under the age of 13 who participate in performances or events run by Pirton Players must sign a written consent form to be provided in hardcopy and retained by Pirton Players in accordance with this policy.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 Personal Data.

Controller

Pirton Players is the controller and responsible for this website and your Personal Data (collectively referred to as Pirton Players, "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Pirton Players

Email address: secretary@pirtonplayers.org

Postal address:

Pirton Players

c/o The Secretary

11 Colemans Close

Pirton

Hertfordshire

SG5 3FJ

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in December 2020. 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.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, email address or similar username identifier, title, date of birth, your image and/or voice captured in either a photograph or film, physical measurements (if required, such as height, shoe size etc.) and gender.

- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you (reimbursement or expenses) and other details of products (i.e. tickets to shows, membership fees) 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, purchases or orders made by you, your interests, preferences and any feedback.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

We generally do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences, unless as required as part of a Disclosure or Barring Service (“DBS”) check and if such check is required (for example, if you were to have supervision of, or accompany, minors), we would request your consent to that DBS check prior to making a DBS application. There may be instances whereby we ask you to complete a health and safety form and disclose any health issues which would enable us protect you, for example, if you have epilepsy, we can take precautions to ensure, for example, that a show’s lighting will not adversely impact you and your participation in the show is safe.

If you fail to provide Personal Data

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 permit you to perform in a production or to provide you with tickets to a performance). In this case, we may have to cancel your membership of Pirton Players or we may be unable to sell you a ticket to our events but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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 when you attend performances in person without booking tickets through our website. This includes Personal Data you provide when you:
 - purchase a ticket for a performance ‘on the door’ or otherwise in person;
 - register as a member of Pirton Players on our website;

- subscribe to our publications, such as any programmes for performances;
- claim back expenses through Pirton Players (for example, reimbursements for costume accessories, refreshments etc.);
- have a costume fitting for use in a performance;
- request marketing about future performances to be sent to you; and/or
- give us feedback/review a performance or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies 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 at www.pirtonplayers.org/cookie-policy for further details.
- **Third parties or publicly available sources.** We will receive Personal Data about you from various third parties as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google and Facebook; and
 - (b) search information providers such as Google.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as TicketSource based inside the UK.
 - **Photographs.** You may give us your Identity Data as your image may be captured through photographs, recordings and/or on film either during a performance as an audience member or as a member of the cast or support crew. Such photographs and/or recordings may be used on our website and/or marketing materials for future performances.

4. HOW WE USE YOUR PERSONAL 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 e.g. the sale and purchase of tickets for performances or registering you as a new member.
- 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 obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your Personal Data

We have set out below, in a table format, 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. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member of Pirton Players or update your existing membership information	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To process your membership and ticket purchases including: (a) Manage payments and membership fee (b) Collect and recover money owed to us (c) Reimburse you for any expenses you made on our behalf	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us or to process expenses owed to you)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review for a performance	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To administer and protect Pirton Players and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of 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

- **Legitimate interest** means the interest of Pirton Players in conducting and managing its activities to enable it to operate in a viable and effective way and to give you the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where we consider any negative impact on you (unless we have your consent or are otherwise required or permitted to by law) overrides our legitimate interests. Where required by law, upon request from you, we will provide you with further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities.
- **Performance of a contract** means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal obligation** means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

Marketing

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which Pirton Players' performances and events may be of interest to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, become a member of the Pirton Players or purchased a ticket from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by unsubscribing from our MailChimp or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of you becoming a member of the Pirton Players or purchasing a ticket for a performance from us.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see www.pirtonplayers.org/cookie-policy

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURE OF YOUR PERSONAL DATA

We may share your Personal Data with third parties for the purposes set out in the table above.

We use a third party online platform called TicketSource (<https://www.ticketsource.co.uk/>), an online ticketing software provider, which processes online ticket purchases for events and performances on our behalf. The privacy policy of TicketSource can be accessed: here <https://www.ticketsource.co.uk/kb/terms-of-use/customer-data-privacy-policy>.

We may also use third party costume designers to design or tailor costumes on your behalf and we would share with them your Identity Data, as applicable.

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.

6. INTERNATIONAL TRANSFERS

We do not transfer your Personal Data outside the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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.

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.

8. DATA RETENTION

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

If you sign up to become a member of the Pirton Players (which is conditional on payment of a small fee), we have to keep some basic information about our members (including Contact, Identity, Financial and Transaction Data) by law for six years after they cease being members for tax purposes.

In some circumstances you can ask us to delete your data (see *your legal rights* below for further information).

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

If you are located in the UK, under certain circumstances, you have rights under data protection laws in relation to your Personal Data. These rights include:

- **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. 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 affects 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 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 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.

If you wish to exercise any of the rights set out above, please contact The Secretary at secretary@pirtonplayers.org or Pirton Players, c/o The Secretary, 11 Colemans Close, Pirton, SG5 3FJ.

No fee usually required

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 could 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 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

Version Dated: January 2021