

PRIVACY POLICY

Review Date: _____

Next review due: _____



1) Who we are

Old Well Theatre Trust is a registered charity in Scotland (charity number SC012701).

Old Well Theatre Trust's registered address is Old Well Theatre Trust, Dye Mill, Sidmount Avenue, Moffat, Dumfriesshire DG10 9BS

This Privacy Policy relates to information which is obtained by Old Well Theatre Trust and for which Old Well Theatre Trust is the Data Controller.

2) Old Well Theatre Trusts purpose

The objects of the Old Well Theatre Trust are to advance the education of the public in the performing arts and to further public appreciation of the said arts by

[a] presenting for public performance a balanced range of performances of artistic and cultural merit.

[b] creating opportunities for public involvement in all aspects of the performing arts and

[c] providing educational opportunities in the performing arts.

Our members and supporters help us to achieve this in a variety of ways,

We take active steps to make sure that our members and supporters are aware of the ways in which they can help us achieve our overall purpose.

Members and supporter's information will NOT be stored within view of any visitor/s to the Old Well Theatre (either by paper or electronic storage).

3) Why we hold and process members and supporter's personal data

We hold and process members and supporters' personal data for a number of reasons:

- To keep a record of subscriptions and donations made and actions taken by our members and supporters and our communications with them
- To send our members and supporters marketing information about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to
- To fulfil obligations entered into with members and supporters
- To support volunteers
- To record campaigning actions by members and supporters
- To support community based fundraising and campaigning
- To ensure we do not send unwanted information to members and supporters or members of the public who have informed us they do not wish to be contacted

4) When & why we send you communications

Old Well Theatre Trust will only contact you for marketing purposes - for example keep you up to date on our work, or let you know of ways in which you can support that work - where we have your consent or we are otherwise allowed to do so (see section 5 for details).

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (post, email and phone). We will not send you marketing material if you tell us that you do not wish to receive it. There are a variety of ways you can do this, please see section 13 for details.

You can update or withdraw your consent at any time, for individual channels of communication, or for all channels. See section 13 for details on how to do this.

5) Reasons why you may receive information from Old Well Theatre Trust

Membership gives your consent for us to contact you for the purposes above.

Information requests (non-members) where you have requested information on events & productions this gives your consent for us to contact you for the purposes above.

Contracts where processing is necessary for the performance of a contract to which you are party gives your consent for us to contact you for the purposes above.

6) How and when we collect information

Old Well Theatre Trust may collect your personal data in the following circumstances:

a. When you give it to us DIRECTLY

You may give the Trust your personal data when you (i) join our membership (ii) complete an incoming show, hire or parental consent form, (iii) complete a PVG membership application, (iv) when you communicate with the Trust, or (v) when you complete a request for information form.

b. When you give it to us INDIRECTLY by way of posters advertising your incoming production.

c. When you access Old Well Theatre Trust's Social Media

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

<https://www.facebook.com/policy.php>

<https://twitter.com/en/privacy>

<https://www.whatsapp.com/legal/#privacy-policy>

<https://www.linkedin.com/legal/privacy-policy>

d. When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organisations like Old Well Theatre Trust. In this scenario, Old Well Theatre Trust may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and data from Companies House. Old Well Theatre Trust will not retain publicly available data relating to major donors without their consent, which will be sought at the earliest practical opportunity.

e. When we use cookies

Cookies are created by your web browser when you visit our website. Every time you go back to the Old Well Theatre Trust website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant Old Well Theatre Trust content on social media services such as Facebook - these are known as 'retargeting' or 'advertising' cookies.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), Old Well Theatre Trust may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The Old Well Theatre Trust website contains hyperlinks to websites owned and operated by other organisations. These third-party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

7) What information Old Well Theatre Trust might collect about you

We only collect personal data relevant to the type of transactions you have with Old Well Theatre Trust.

For example, when you join the membership, request information, contact Old Well Theatre Trust to make a donation, or sign up to any of Old Well Theatre Trust's activities, services or online content or if you telephone, email, write to or text Old Well Theatre Trust, or engage with Old Well Theatre Trust via social media channels, we may receive and retain personal information about you.

The information we collect is relevant to the type of transaction you are entering into with details such as your name, email address, postal address, telephone or mobile number.

Sensitive Personal Data

We do not collect "sensitive personal data" about our members and supporters, e.g. health status, unless there is a clear reason for doing so - where we need this to ensure that we provide appropriate facilities or support to enable you to participate in an event. Clear notices will be provided on application forms for such events so that it is clear what information we need and why we need it.

8) How will Old Well Theatre Trust use your personal data

Old Well Theatre Trust will use your personal information for the following purposes:

a. **For administrative reasons**, including:

- "service administration", which means that Old Well Theatre Trust may contact you for reasons related to administering any consented communication, administering donations you have made or online content you have signed up for;
- to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used for example if you donate in addition to joining our membership.
- in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to keep your data up to date - for instance we use the Royal Mail's data on postal address changes to ensure that we can maintain contact with you where we believe you are happy to be contacted by post.
- to implement any instructions you give us to with regard to withdrawing consent to send information or withdraw of membership partway through the year of membership.

9) Will Old Well Theatre Trust share your information with anyone else

We will only use your information within Old Well Theatre Trust for the purposes for which it was obtained. Trustees, President, Committee members and co-ordinators names will be published as necessary for the running of the Trust, this will be name only. Your details may also be shared with licensing authorities where you volunteer to apply for a licence. Names of anyone acting for or acting against the Trust may be included in trust/committee minutes and/or the Old Well Theatre Annual Report.

Old Well Theatre Trust will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

Old Well Theatre Trust's suppliers

We may need to share your information with service providers or volunteers who help us to deliver our projects, fundraising activities and appeals, for instance through handling responses. We do not allow these service providers or volunteers to use your data for their own purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

Facebook and other Social Media Sites

There are two ways to prevent social media use of your data, you can either update your preferences at Old Well Theatre Trust by opting out of the relevant channel of communication or you can do this via the social media site:

Facebook: <https://www.facebook.com/help/568137493302217>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>

Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

Updating your preferences with Old Well Theatre Trust will not guarantee that you never see Old Well Theatre Trust content on social media, since the social media site may select you based on other criteria and without your data having been provided by Old Well Theatre Trust.

Where legally required

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

Your data is not processed outside the UK.

10) Breach of privacy or data protection

In the event a breach of privacy or breach of data protection occurs individuals and any necessary authorities will be notified promptly and action taken to rectify the breach.

11) How long will Old Well Theatre Trust keep your information

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of membership & donations for 10 years to comply with HMRC rules.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Where you contribute material to us, e.g. user generated content or in response to a particular production campaign we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

All personal data is stored securely and access is limited to the minimum number of relevant staff. It is deleted when no longer relevant, paper by shredding, electronic by deletion. It is never shared with third parties and is available to you at any point should you wish to see it.

Children: All data received in respect of children contributing in productions at the theatre is treated as sensitive information and will only be kept for the period of the production, programme, training event or workshop. Data will be destroyed, paper by shredding, electronic by deletion immediately after the event has ended.

12) The Old Well Theatre Trust abide by GDPR (General Data Protection Regulation) rights:

1. **The right to be informed**
2. **The right of access**
3. **The right to rectification**
4. **The right to erasure**
5. **The right to restrict processing**
6. **The right to data portability**
7. **The right to object**
8. **Rights in relation to automated decision making and profiling**

13) How to control what we send you or request we update your personal information

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you, or update the information we hold, then please contact us:

- email us at changes@oldwelltheatre.co.uk
- write to us at: Changes, Old Well Theatre Trust, Dye Mill, Sidmount Avenue, Moffat, Dumfriesshire DG10 9BS
- call us on 01683 220681

Additionally, you can opt out of marketing emails at any time by replying to any email from the Old Well Theatre.

14) How long will it take for these changes to be effective?

We endeavour to meet the following service levels where members and supporters request we do not send them marketing information:

- Email - 24 hours from receipt of email
- Telephone - 24 hours from receipt of request to opt out
- Mail - 28 days from receipt of 'do not mail' request.

15) Right to see info

You have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected.

Please supply a First Class A4 large letter addressed envelope and details about yourself and the information you are seeking. Proof of your identity, including your name, date of birth, current address (e.g. a copy of your birth certificate, passport or driving licence). Proof of current address (e.g. a bank statement, recent utility bill or council tax bill).

Please address requests and questions about this Privacy Policy to the Data Protection Officer, Old Well Theatre Trust, Dye Mill, Sidmount Avenue, Moffat, Dumfriesshire DG10 9BS

We will reply within 1 month of receiving your request.

16) How Old Well Theatre Trust keeps your data safe

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible to the minimal amount of appropriately trained staff and volunteers.

We do not use external companies to collect or process personal data on our behalf.

17) Old Well Theatre Trusts use of cookies

How to control and delete cookies

If you wish to restrict or block the cookies which are set by any website, you can do this through your browser settings. The Help function within your browser should tell you how.

Alternatively, you may wish to visit www.aboutcookies.org which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

Please be aware that restricting cookies may impact on the functionality of any website.

The Old Well Theatre Trust website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of the website and compile reports for us on activity on the site.

Google Analytics Google stores the information collected by the cookie on servers in the United States of America. 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 the Old Well Theatre Trust website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

How to reject or delete this cookie

<https://www.google.com/intl/en/privacypolicy.html>

Cookies set by Third Party sites

To enrich our content, we sometimes include links to other sites. As a result, when you visit a page via a link from our website, these sites may set a cookie.

Old Well Theatre Trust does not control the dissemination of these cookies and you should check the relevant third party website for more information about these.

18) How to make complaints about this privacy policy or raise privacy concerns

If you would like more information, or have any questions about this policy, please contact us by email at changes@oldwelltheatre.co.uk or write to us at: Old Well Theatre Trust, Dye Mill, Sidmount Avenue, Moffat, Dumfriesshire DG10 9BS

To make a formal complaint about Old Well Theatre Trust's approach to data protection or raise privacy concerns directly with our data protection team, please contact:

The Chairman, Old Well Theatre Trust, Old Well Theatre, Old Well Road, Moffat DG10 9AP

Email: privacy@oldwelltheatre.co.uk

You also have the right to make a complaint direct to the UK's data protection authority, the Information Commissioner's Office (ICO). The ICO can be contacted at: <https://ico.org.uk/global/contact-us/>

Concerns can also be logged via the [ICO website](https://ico.org.uk/global/contact-us/).

19) Changes to Old Well Theatre Trusts privacy policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to Old Well Theatre Trust. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the Old Well Theatre Trust website to submit personal information to Old Well Theatre Trust. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.