



SEWELL BARN THEATRE SOCIETY – POLICY PAPER 1

Privacy and Data Protection: Policy and Procedures

Introduction

The Sewell Barn Theatre Society will only collect, keep and use personal data where it is necessary for the legitimate purposes of the society. This policy explains how personal data needed for the operation of the Society is managed in a fair, lawful and transparent way in compliance with data protection standards and the General Data Protection Regulations (GDPR). Such data may relate to members, volunteers, audiences, contractors, suppliers, business contacts and other people the society has a relationship with or regularly needs to contact.

This policy **applies to all those handling personal data on behalf of the Society**, protecting their rights as well as others in the above groups. In addition to ensuring GDPR compliance, this policy **follows good practice and minimises the risk of a data breach**. Whenever we need to collect any personal data, we will say why we need to do so and what it will be used for.

Sewell Barn Theatre Society's Data Protection Officer is responsible for all privacy and data protection issues. Anyone wishing the Society to update, correct or delete their personal data should contact that individual, via dataprotection@sewellbarn.org (alternatively via admin@sewellbarn.org).

We will never pass personal information on to third parties for marketing purposes. Where third party services are used to process your data (e.g. DropBox, TicketSource and Mail Chimp), we will use due diligence to ensure that any such third parties are reputable, secure, and protect your rights under GDPR.

We do not knowingly collect or store any personal data about children under the age of 16.

The data we collect and what we use it for

The Sewell Barn Theatre Society is a Data Controller under the GDPR. We collect data to enable us to plan, organise and run the day-to-day operations of the society (e.g. coordinating rehearsals selling tickets and collecting subscription payments) and to promote the Society's activities (e.g. marketing mailing lists and photography). Data is collected from five main groups (members and others directly involved in activities, event attendees, mailing list subscribers, website visitors, and contractors), for the purposes given below.

Data on members and others involved in the Society's activities: for necessary administration

When you join the Society as a member, or during your membership with us, we may need to collect some of the following information on you:

- Name
- Phone number
- Postal address
- Email address
- Age/gender
- Gift Aid declarations

This data will be used by the Management Committee to manage the membership of the Society and to organise and run our activities.

Additional personal details may be collected when members, or others, directly participate in the Society's productions and other activities (e.g. audition notes; photographs), or take up a position with the Society (e.g. financial information, in order to process expenses claims), or are unfortunate enough to require first aid (entry in the Accident Book).

We will periodically remind members of their privacy rights, including the option to have their personal data deleted or to be removed from mailing lists.

Data on event attendees: for processing and managing tickets

For online booking of ticketed events, we need to collect data on the person booking (name and contact information) in order to send confirmation of the booking and allow access to the event.. This data will only be used on an event-specific basis; it will not be used for marketing or promotional messages unless additional consent is given (see below).

Data on mailing list subscribers: for marketing and promotion

We offer everybody the opportunity to sign up (consent) to receive marketing and promotional information on the Society's events and activities, e.g. the Newsletter, primarily by email.

Sign-up to our mailing list requires some combination of name, email, phone number and address. We may also ask for preferred topics and communication methods. We will only send information that is directly related to the Sewell Barn Theatre Society; we will not use the mailing list to send marketing messages from third parties. Anything we send will include a clear option to unsubscribe from the mailing list, and this can also be done at any time by contacting the Data Protection Officer.

Data on website visitors: for running and improving our website

We use cookie technology when a person visits our website to collect and analyse anonymised data on how many people have visited, what pages they have looked at and other statistical information.

We use a pop-up banner to let users know about this on their first visit, and they can at any time disable cookies in their browser if they do not wish their anonymised data to be tracked. You can find out more about cookies at www.allaboutcookies.org.

Data on contractors and business contacts: for administration and legal purposes

We may need (for administration or legal reasons) to collect personal data on contractors, suppliers or other business contacts of the Sewell Barn Theatre Society. Where this is the case, we will explain what this is for at the point of collection.

Individual rights

Under the GDPR, individuals have the following rights over data collected by the Sewell Barn Theatre Society. The Society will ensure its data processes comply with these rights, and will make all reasonable efforts to fulfil requests from an individual in relation to these rights.

- *Right to be informed:* whenever the Society collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* individuals can request to see the data the Society holds on them and confirmation of how it is being used. Requests should be made by email to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. Any requests for data to be updated will be processed within one month.

- *Right to object*: individuals can object to their data being used for a particular purpose. The Society will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to erasure*: individuals can request for all data held on them to be deleted. The Society's data retention policy (below) will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless there is a lawful reason to keep and use the data for legitimate interests or contractual obligations.
- *Right to restrict processing*: individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, the Society will restrict the data while it is verified).

Individuals also have rights related to *portability and automated decision making* (including profiling), although this is very unlikely to apply to the data held by the Society.

Further information on data protection rights can be found on the Information Commission's Office website www.ico.org.uk.

How we get consent

Sewell Barn Theatre Society regularly uses personal data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about group news, fundraising and other group activities. When data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a tick box)
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Sewell Barn Theatre Society to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market third-party products unless this has been explicitly consented to). Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

Data storage and retention

The Sewell Barn Theatre Society will not keep records for longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records). The Society will therefore review all data held on individuals at least every two years and remove data where we no longer have a legitimate reason to keep it. Information on individuals' involvement in past productions, including photographs, is likely to be retained on a long-term basis for archival and publicity purposes. Where you have withdrawn your consent for us to use your data for a particular purpose (e.g. unsubscribe from a mailing list) we may retain some of your data for up to two years in order to preserve a record of your consent having been withdrawn.

The Sewell Barn Theatre Society will ensure that the data it holds is kept secure:

- Electronically-held data will be held within a password-protected and secure environment

- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data (e.g. print-outs of records) will be stored under lock and key
- Access to data will only be given to relevant Management Committee Members, Trustees, contractors or others where it is clearly necessary for the running of the Society. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data
- We only share members' data with other members with the subject's prior consent.

With regard to the last bullet above, the Society encourages communication between members. To facilitate this, members can request the personal contact data of other members in writing via the Data Protection Officer or Membership Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address) and the subject has consented to their data being shared with other members in this way.

Regular data review

A regular review of all data will take place to establish if Sewell Barn Theatre Society still has good reason to keep and use the data held at the time of the review. As a general rule a data review will be held every three years and no more than 40 months after the last review. The following data will be reviewed:

- digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- data stored on third party online services (e.g. Google Drive, Mail Chimp)
- physical data stored at the homes of committee members.

The review will be conducted by the Data Protection Officer with other Management Committee members to be decided on at the time of the review. The data that is not kept will be deleted as follows:

- physical data will be destroyed safely and securely, including shredding
- all reasonable and practical efforts will be made to remove data stored digitally
 - priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data
 - where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

The following criteria will be used to make a decision about what data to keep and what to delete:

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details

Do we have consent to use the data? This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised?	Anonymise data	Continue to use

Statutory requirements

Date stored by Sewell Barn Theatre Society may be retained based on statutory requirements for storing data. These might include but are not limited to:

- Gift Aid declarations records
- details of payments made and received (e.g. in bank statements and accounting records)
- Trustee meeting minutes
- contracts and agreements with suppliers/customers
- insurance details.

Other data retention procedures

Member data: When a member leaves Sewell Barn Theatre Society and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted.

Mailing list data: If an individual opts out of a mailing list, that person’s data will be removed as soon as is practically possible. .

Volunteer and freelancer data: When a volunteer or freelancer stops working with Sewell Barn Theatre Society and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted.

Other data: All other data relating to members, mailing lists, volunteers and freelancers and others will be stored safely and securely, and included in the regular three year review.

What we do if anything changes

If we make changes to our privacy statements or processes we will post the changes on our website. Where the changes are significant, we may also choose to email individuals affected with the new details. Where required by law, we will ask for your consent to continue processing your data after these changes are made.

Policy review

The policy will be reviewed every three years by the Policies Subcommittee and any significant amendments will be referred to the Management Committee for ratification. It may also be reviewed in response to changes in relevant legislation, good practice, or in response to an identified failing in its effectiveness.

Policy initially drafted and adopted: June 2018

Policy last reviewed: October 2023

Next review due: Autumn 2026