

## **Pound Arts Privacy Policy**

The Pound Arts Trust Limited is committed to protecting your privacy and safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act 1998 and the General Data Protection Regulation 2018.

Collecting this data makes it easy for you to book shows and events, keep up to date with our activities, and engage with us in other ways like our Creative Learning Programme or supporting our continued future. It also helps us to report on the work we do as an organisation to our funders, and to claim Gift Aid. We do not obtain any personal data that we think would be likely to cause individuals to object to or complain about, but we are always open to discuss with you any of the information we hold.

### **Who we are**

Pound Arts is an arts organisation based in Corsham and a registered charity. We run The Pound, the arts hub for North Wiltshire based in Corsham, two annual festivals, and Rural Arts Touring, which comprises of the rural touring schemes for Wiltshire and South Gloucestershire. Pound Arts also delivers education and outreach projects in Corsham and across Wiltshire, working to improve and sustain arts education and access to the arts for all ages.

The Pound Arts Trust Limited is a Charity Registered in England and Wales number 1102787 and a company limited by guarantee registered in England and Wales number 4789736.

### **How we use the data we collect**

Pound Arts is committed to protecting you and your family's personal information when you are using any of our services. We want the services we provide to be safe and enjoyable environments for our audiences, customers and visitors. This Privacy Notice relates to our use of any personal information we collect from you via the following services:

- our website
- social media
- our emails to you
- your visit to Pound Arts

It also relates to our use of any personal information you provide to us by phone, email, in letters and other written correspondence, and in person.

In order to provide you with access to book tickets with us and stay in touch with us about what we're doing, we need to collect information about you.

This Privacy Policy explains the following:

- what information Pound Arts may collect about you;
- how Pound Arts will use information we collect about you;

Last edited on: 21 May 2018 [pending approval by the Board of Trustees]

Due for review: May 2020

- when Pound Arts uses your details to contact you;
- when Pound Arts will disclose your details to anyone else;
- your choices and rights regarding the personal information you provide to us;
- the use of Cookies on our website and how you can reject Cookies.

### **The information that we collect, process, hold and share**

- Personal Information
  - Full Name and Title
  - Email Address
  - Phone Numbers and Mobile Number
  - Address
  - Membership Details
  - Purchase History
  - Donation History and Pledges
  - Gift Aid status
- Bank Details (for setting up Standing Orders)
- Email and Newsletter records including emails sent, emails opened by you, and links opened by you
- Anonymised Information
  - IP address
  - Operating system
  - Cookies

### **Why we collect and use this information**

We use your data for these specific purposes, unless you ask us not to:

- To enable you to book and pay for tickets via our website, over the telephone and in person by setting up a customer account in your name.
- To enable us to contact you to provide important information in advance of your booked event, such as details of the location of the event or if the event has been cancelled.
- To enable us to email you with a survey after seeing a show in order to evaluate the success of an event and improve Pound Arts' programme and facilities.
- To enable us to contact you about similar shows and events at Pound Arts.
- To enable us to email you with our upcoming shows and events at Pound Arts, providing we have your consent to do so.

Last edited on: 21 May 2018 [pending approval by the Board of Trustees]

Due for review: May 2020

- To evaluate the services and events we provide, in order to improve them for the future; and to report on them to our funders like Arts Council England and Wiltshire Council.
- To identify recurring visitors and to analyse their browsing habits within the website (Cookies)
- To share anonymised information to support arts marketing commissioned in England (Arts Council England, Audience Finder) to enable the delivery of high-quality art.
- To help us investigate complaints, legal claims or important incidents

#### **How we collect and use this information**

- Pound Arts is the data controller for all the data we store. We use Data Processors to help us collect, process, and safely store the data that we obtain.
- We use our website to sign you up to our E-Newsletter database. Our website is provided by Paul Doman.
- We use Databox Ltd to process our Box Office ticketing system, and to report on your order history, donation history, membership status, and to show trends in sales patterns.
- We use Send in Blue to send Newsletters and keep in touch via email.
- We may use other similar services provided by other parties, but which do not adversely affect your rights on the terms of this notice.

#### **The legal basis on which we use this information**

There are three legal bases under which we may process your data.

##### **Contract Purposes**

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data.

- To confirm your booking by way of a confirmation email, sending your tickets to you in the post, or to confirm your identity when collecting your tickets.
- To enable us to contact you to provide important information in advance of your booked event, such as details of the location of the event or if the event has been cancelled.
- To enable you to book and pay for tickets via our website, over the telephone and in person by setting up a customer account in your name.

##### **Explicit Consent**

When appropriate, we will ask you for your explicit consent before using your personal information in that specific situation. We will update your consent periodically. You have the right to withdraw consent at any time, and this can be done by contacting our Box Office:

- To enable us to contact you about how you can support us.
- To thank you for donating to us and telling you how your money will be well spent.

### **Legitimate Business Interests**

We collect and process your personal information for purposes that are in our legitimate organisational interests. We do this carefully, and in a way that we believe there is no overriding prejudice to you by using your personal information in this way. You have the right to object, amongst other rights explained later in this document.

- To enable us to contact you about similar products and services (shows, events and merchandise) available at Pound Arts.
- To enable us to email you with a survey after seeing a show in order to evaluate the success of an event and improve our programme and facilities.
- To drive evaluation and statistics of the services and events to provide, in order to improve them for the future, and report them anonymously to our funders like Arts Council England.
- To analyse the data we hold about you in order to identify and prevent fraud.
- To analyse the way in which our website is used and the content and links that you interact with, in order to improve our website services.
- To analyse the way in which our emails to you are received by you, and the content and links that you interact with, in order to improve our communications with you.
- To analyse the data we hold about you to ensure that the content and timing of our communications to you are as relevant as possible.
- To maintain notes of our customers according to customer booking and other personal customer account data that you provide us, as well as publicly available internet research for the purposes of our marketing communications to you, and to enable us to communicate in a relevant way with you, but not to make any automated decisions based on profiling of any consequence to you whatsoever.
- To share anonymised information to support arts marketing commissioned in England (Arts Council England, Audience Finder) to enable the delivery of high-quality art.

### **Children**

We take the protection of children and their personal data very seriously. For our Creative Learning department, when we ask you for additional personal information, this may be for children as well. We therefore provide you with an additional Privacy Notice at this point so that you are informed about what information we will be asking for and how we will be using it.

### **Web Browser Cookies**

Pound Arts may set and access Cookies on your computer. A Cookie is a small file that resides on your computer's hard drive and often contains a unique identifier and is accessible only by the website that placed it there, not any other sites. You may restrict your internet browser's use of Cookies.

- You may delete Cookies, however you may lose any information that enables you to access the website more quickly.
- You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered.

Last edited on: 21 May 2018 [pending approval by the Board of Trustees]

Due for review: May 2020

- For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of services available on the website.

### **Collecting this information**

Whilst the majority of the personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis, and we will make this clear to you when we collect the data from you by marking the 'Required' fields. Anything that does not say 'Required' next to it is voluntary.

### **Not providing information**

You may access certain areas of the website without providing any data at all. However, to use all services and systems available on the website you may be required to submit customer account information or other data.

You do not have to provide us with all the information we may ask you for. It is up to you.

Any information that we ask for other than those listed below is entirely voluntary. Not providing any of the voluntary information will not preclude you from any of the products or services we offer or effect you in any other way.

In order to sign up to our eNewsletter, we only require:

- First Name
- Last Name
- Email Address

In order to book and pay for tickets, we only require:

- Your customer account details, and –
- Card Type
- Card Number (we never store your full card number)
- Expiry Date
- Start Date (only if required by your bank)
- Issue Code (only if required by your bank)
- Security Code (we never store your 3 or 4 digit security code)

All debit and credit card information is processed securely, and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

## Storing this information

We store your personal data securely using suitable physical, electronic and managerial procedures to safeguard and secure all and any customer data and personal information. We will ensure that any third parties we use for processing your personal data do the same. We limit internal access to your personal data to only those who require it, and provide all our staff with Data Protection and Information Security training. We ensure that high standards of security and protection are met by abiding by our Data Protection Policies and Procedures, and these are governed by the Senior Management Team and the Board of Trustees.

All our staff are required to protect your information, and inform you of how your information will be used. This includes, in most circumstances, allowing you to decide if and how your information can be shared. Everyone working for Pound Arts is subject to the duty of confidentiality. Information provided in confidence will only be used for the purposes advised and consented to by the service user, unless it is required or permitted by the law.

Whenever your information is stored online, we have a data sharing agreement with the data processor which states the requirements of high level security for your personal data. Should there be a breach of this data, they are obliged to inform us immediately and we will then inform you if it is necessary under Data Protection guidance. It is your right to be informed.

When we do send you information, we do so securely and are committed to reporting any breaches of data during its transit. Whenever possible all information that identifies you will be removed.

Your personal information may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") and may also be processed by staff operating outside the EEA who work for one of our service providers.

When we, or our permitted third parties, transfer your information outside the European Economic Area, we or they will impose obligations on the recipients of that data to protect your information to the standard required in the European Economic Area or otherwise require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where: (i) the transfer is to a country deemed to provide adequate protection of your information by the European Commission; or (ii) where you have consented to the transfer.

## Retention periods

We will only retain information for as long as necessary. Records are maintained in line with our Record of Processing Activity which determines the length of time records should be kept. We are bound by law to retain certain financial records, and these circumstances override our other retention periods.

We will ask you to check and update your contact preferences periodically so that we know our database is up to date. You can withdraw your consent, or make changes to your contact preferences at any time.

- We actively maintain customer data, including communications with you, previous records or ticket, donations, membership status and other purchase histories to allow you to sign in

Last edited on: 21 May 2018 [pending approval by the Board of Trustees]

Due for review: May 2020

to your account even if you have not booked with us for a while, and to continue to allow you to update and make changes to your marketing preferences. This also allows us to look up your customer account if you book with our box office staff. If your account has had no activity for some time, before it has gone 6 years with no activity, it will be made inactive from our database, thereby restricting access to the information, but it is stored indefinitely such that for any subsequent enquiry or activity you make we are able to link back to a single unique record that we hold for you on our system.

- We retain any complaints, queries or written communications with you for 5 years.

When personal data is no longer required by the organisation, it is deleted or securely destroyed.

You have the right to request we remove the information we store about you. Please contact us, and we will be happy to arrange this for you if you want us to. Any objections you make to any processing of your data will be stored against a record on our system so that we can comply with your request.

### **Who we share personal information with and how this will affect you**

We do not sell any of your information for the purposes of marketing or fundraising. We do not share your personal information with third parties, unless you have given us specific consent to do so, or if we are required to do so in order to deliver a Box Office service at another venue, or due to our obligations to comply with current legislation and bank transactions, or our duty to comply with a Court Order.

However, we do employ the services of other party's software and services in order to collect and store your personal information, for example we use Databox as our ticketing system software provider for booking tickets and creating customer accounts. The providers of such services may have access to certain personal data provided by you. Any data used by such parties is used only to the extent required by them to perform the services that Pound Arts requests. Any use for other purposes is strictly prohibited within a data sharing agreement between us and the provider. Furthermore, any data that is processed by third parties must be processed within the terms of this policy and in accordance with the United Kingdom Data Protection Act 1998 and General Data Protection Regulation 2018.

### **Your rights**

You have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- object to the processing of your data where Pound Arts is relying on its legitimate interest as the legal grounds for processing;
- prevent processing of your personal data;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

The best person to contact regarding data protection at Pound Arts is the Director, by emailing [admin@poundarts.org.uk](mailto:admin@poundarts.org.uk) or telephoning 01249 712618.

### **Right to lodge a complaint**

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at [ico.org.uk/concerns](http://ico.org.uk/concerns).

### **How to access your personal information (Subject Access)**

You have the right to see the information that Pound Arts holds about you, and why we hold it. You also have the right to rectify any inaccurate information we hold about you. Requests must be made in writing (not verbally). You will need to provide:

- Full name, address, email address, phone number, so that your identity can be verified against our records and your information located
- Copy of Photographic ID
- An indication of what information you are requesting to enable us to locate this in an efficient manner

A request for information must be made with the appropriate person: the Director, by emailing [admin@poundarts.org.uk](mailto:admin@poundarts.org.uk) or telephoning 01249 712618.

There is no fee for Subject Access Requests. Pound Arts reserves the right in certain situations to refuse the request; otherwise we will comply within one calendar month.

The request's response will cover the following detail;

- Any personal data that is being processed
- A description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people
- A copy of the information comprising the data; and details of the source of the data

If you require Subject Access Requests or our response to them in braille or any other format please contact us and we will happily arrange this as quickly as possible.