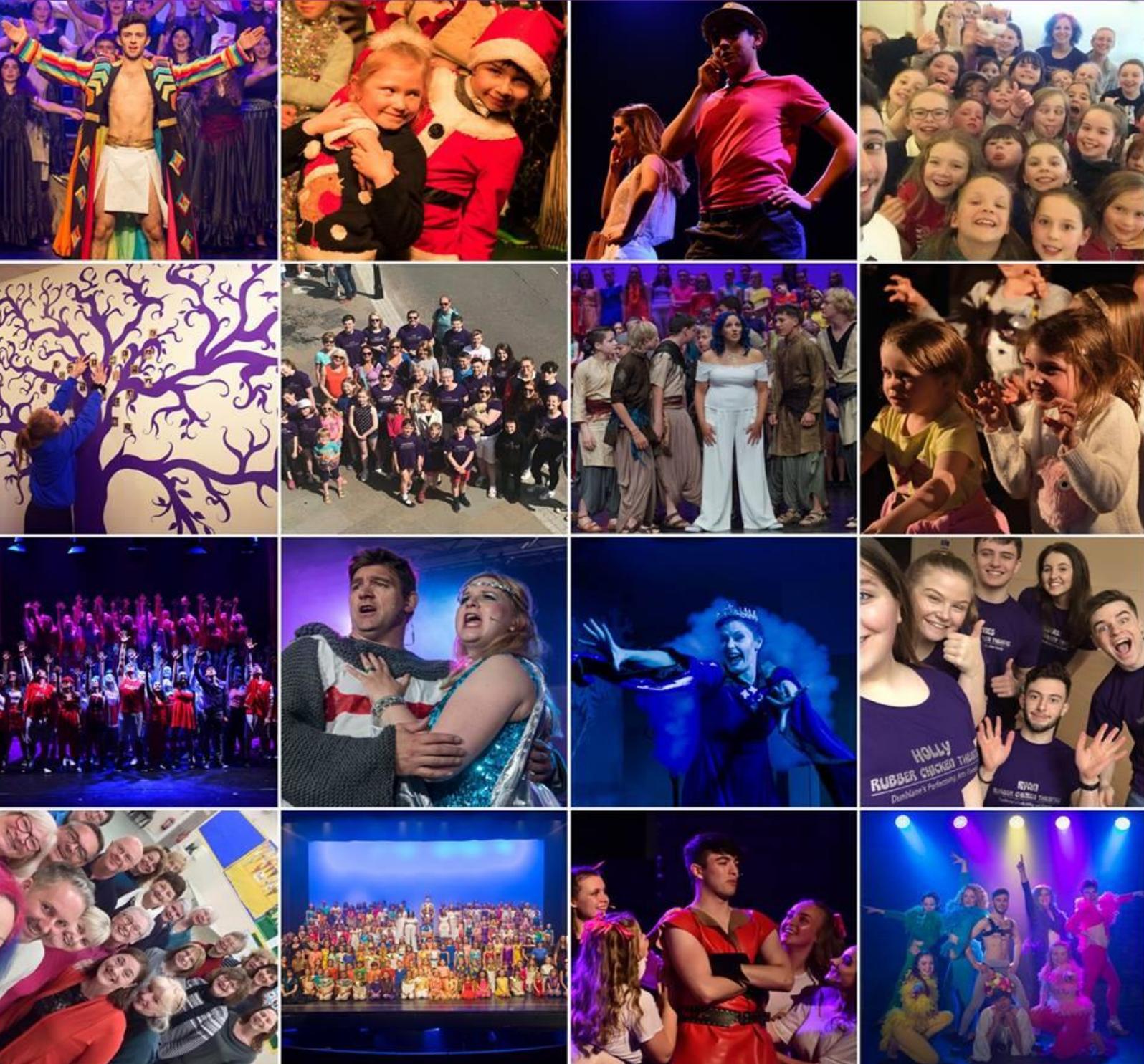


# Privacy Policy

How we collect, store and use the information you provide



## **About this Document**

Version 1.00 of this document this document was created in Oct 2018 by Leigh Austin (Operations Officer) and approved for use in the company by Pamela Mackie (Creative Director) in Oct 2018. It is to be reviewed in Oct 2021. It will remain version 1.00 until it's planned review. Any interim or priority reviews will be noted by an increase in version number after the decimal point. (ie. V.1.01, V.1.02 etc.

## **Out of Scope Incidents**

Where an incident occurs that may have privacy implications but is not explicitly covered in this document, the Operations Officer should attempt to resolve the incident in best interests of those affected and in any case in line with the law. If necessary, advice may be sought from the Information Commissioner's Office (ICO).

## **Interim / Priority Review**

An interim or priority review of and if necessary, an amendment to, this document may take place at any time before its planned review date under instruction from the Creative Director and in all cases where an Out of Scope Incident occurs.

## **Review / Amendment History**

Oct 2018 – Version 1.00. Document creation and sign off.

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## **Responsibilities**

According to the General Data Protection Regulations, Rubber Chicken Theatre CIC acts as a data controller. Among other things, it means that we decide what information we need to collect from you, the lawful basis for doing so, what the information is to be used for, who to share any information with and how long we should keep the information for. We are in charge of the data we collect and as such have legal obligation to protect it.

Within the organisation itself, ultimate responsibility for ensuring we comply with the many information related rules and regulations rests with the Creative Director. On a day to day basis, the Operations Officer will advise the Creative Director on such issues and act accordingly.

## Collecting Your Information

<b>When we collect information</b>	<b>How we collect information</b>	<b>Information we might collect.</b>
When you make an activity or production booking.	Usually, you'll make a booking through our dedicated booking website. This site is operated by Bookwhen. As part of the booking, you'll often be asked to fill an online booking form. The questions asked on this form will vary according to how much information we need.	Name, e-mail, phone number, DOB, any medical, dietary or additional support needs, t-shirt size, school, year group, address, payment information, consent for a child to leave on their own, consent for a child to leave for breaks.
When we ask for additional information relating to an activity or production.	Usually, this is collected either through our dedicated booking website or through a Google form. Google forms are hosted through our dedicated Google account. The questions we ask on these forms will vary depending on need.	Name, e-mail, phone number, DOB, any medical, dietary or additional support needs, t-shirt size, school, year group, address, consent for a child to leave on their own, consent for a child to leave for breaks.
When you join our mailing list	Our mailing list is hosted by Mailchimp. You either join it through giving consent when you make a booking, or by directly adding yourself to the list through our mailing list link that we post occasionally.	Name, e-mail address
When we photograph or film activities	As a performing arts company, we regularly photograph or film activities, rehearsals or performances. Sometimes we take photographs directly, on other occasions we outsource this work to photographers / videographers.	Photographic images or film.

From time to time we may use other companies to collect information. Where this happens, the Privacy Policy will be updated.

## Legal bases for using your data.

Shown below are the legal bases we use for processing the information you provide:

Information	Lawful basis for processing	Why we also use this lawful basis.
Contact Details, Payment Information	Contract	We need to be able to contact you if a booking changes or is cancelled and to collect payment from you.
DOB, Address and School	Legal Obligation	Such information is required by the local authority when we make a Body of Persons Application to comply with the Children and Young Persons Act 1963.
Photographs and film that are used directly for promoting the activity or production you or your child is involved in,	Legitimate Interests	See our section on photographs and filming.
Photographs and film that are subsequently used for general marketing purposes	Consent	See our section on photographs and filming.
Any other information	Consent	Other information helps us provide a service to you, although we can continue to provide you with a service without this information.

## Obtaining your consent

Whenever you make a booking or complete an online form, you will be asked if you agree to us using information that we collect in accordance with our privacy policy. By agreeing to that statement, you provide consent.

## Withdrawing your consent

You can withdraw your consent to us using your personal data by e-mailing [leigh@rubberchickentheatre.co.uk](mailto:leigh@rubberchickentheatre.co.uk). When you do this, we will reply promptly, and tell you the implications of withdrawing consent before asking you to confirm your request. Please be aware if you withdraw consent for some information, we may not be able to provide you with a full service (eg. if you withdraw consent for us to use your t-shirt size, we would be unable to order you a t-shirt.)

## Right to Object

You have the right to object to us using information if it is not covered by the Consent legal basis (because you always have the right to withdraw your consent). If you would like to object to us using information you provide, please e-mail [leigh@rubberchickentheatre.co.uk](mailto:leigh@rubberchickentheatre.co.uk). When you do this we will consider your arguments within your objection and reply to you within one month.

## Storing Your Data

Where we store your information usually depends on what the data is and how we use it.

Information	Where it may be stored
Payment information	Stripe secure servers Sumup secure services
Other information provided at booking	Bookwhen's servers Quickbooks' servers RCT's Google Drive server RCT's Onedrive server Locally on RCT's computers and tablets.
Photographs and film	Locally on RCT's computers and tablets RCT's Google drive server RCT's Onedrive server RCT's Dropbox server Photographers' computers and tablet or cloud server

For more information on external companies privacy policies either e-mail [leigh@rubberchickentheatre.co.uk](mailto:leigh@rubberchickentheatre.co.uk) or contact the company directly.

### Information stored locally

Any information stored on a local PC or tablet is either anonymised or removed and archived on our Onedrive server within 6 months of an activity or production finishing.

### Archived information

We will archive information for a maximum period of 6 years after an activity or production has finished. After this time, information will be anonymised or deleted.

## **Photos and Film**

As a performing arts company, we rely heavily on photographs and film to promote our work. As such we treat it slightly different to other forms of information we collect. We use a two-tiered approach to consent for photography and filming.

Firstly, you will always be asked to provide consent for images or film of you (or your child) to be used for general marketing purposes. If you say no to this, we will not include any photos of you (or your child) in future general marketing literature (both online and printed) until you provide consent again.

However, we believe it is a reasonable expectation to anyone performing on stage that they may be photographed and / or filmed, such is the nature of performing arts. For full scale productions, we use professional photographers who need to be able to shoot freely in order to capture the best images that we can use to promote the production itself. With this in mind, you'll also be asked to provide consent for us to photograph and film you (or your child) and use such images and film to directly promote the production and include them in them in merchandise (such as the cast digital photo pack and cast poster). Whilst you continue to have the right to refuse consent in these situations, we will need to discuss with you the operational effects of doing so. Usually, you won't be able to complete online registration until we have spoken to you regarding this.

