



WICKHAM THEATRE TRUST / THEATRE 62

Wickham Theatre Centre, Corkscrew Hill, West Wickham BR4 9BA

Personal data policy and privacy statement

Introduction

1. Wickham Theatre Trust/Theatre 62 operates on a membership-only basis. It is run by its members on a voluntary basis for the benefit of its members.
2. For the purpose of the policy:
 - a) personal data refers to living individuals who can be identified from the data
 - b) 'member(s)' refers to Full Members, Junior Members, Life Members, Patrons and Friends unless otherwise stated.
3. Wickham Theatre Trust/Theatre 62 seeks to ensure that members' privacy is respected. This policy sets out:
 - a) What we use personal data for
 - b) How and where the data is held
 - c) Who accesses it and who it is shared with
 - d) Which parties are responsible for it
 - e) How long we will be holding the data.
4. Background information on the General Data Protection Regulation (GDPR) can be found at Annex 1.

What personal data is held by Wickham Theatre Trust / Theatre 62

18. For all members: names, postal address, telephone number(s), email address (where provided), theatrical activity preferences, membership number (as issued by the Membership Secretary).
19. On the online ticketing software 'TicketSource': name, address, email address (where provided), telephone number, membership number. See Annex 2 for details.
20. By the box office when tickets are booked: name, telephone number and membership number; also names of family members and friends who have had tickets bought for them by members.
21. The Theatre 62 website and newsletter 'Prompt' and social media (such as Twitter and Facebook) includes photographs of members, most often those involved in productions.
22. Members who seek reimbursement of expenses voluntarily provide their bank details to the Treasurer; the details are saved online on the Wickham Theatre Trust/Theatre 62 bank account.
23. Additional information is recorded for child members (under 16 and of compulsory school age) who have acting roles in any of our productions. This additional information is:
 - a) Date of birth and age of the child
 - b) Telephone numbers (landlines and mobiles) for parents/guardians of the children, not the children's mobile numbers.
 - c) Names and contact numbers of emergency contacts should the parents/guardians not be available
 - d) School the child attends
 - e) Any relevant medical information

Who keeps the master list of data?

11. The elected Theatre 62 Board acts as the Data Controller of Wickham Theatre Trust/Theatre 62. This means it can decide how personal data is managed and for what purposes.
12. The Membership Secretary holds membership data for Full Members, Life Members, Junior Members, Patrons, Friends.
13. Patrons' membership details are also held by the Theatre 62 member with responsibility for renewing Patron's membership each year.
14. The Theatre 62 TicketSource coordinator and Box Office personnel have access to members' data held on TicketSource.
15. Our Safeguarding Officer maintains the additional information referenced at para 10 above. This is stored securely at Wickham Theatre Centre and made available (during the run of a production) to our licensed chaperones.

How is personal data used?

16. Personal data is only used on relevant lawful grounds as permitted by legislation. Personal data is collected and used to help deliver the theatre's activities. Below are the main uses of data which depend on the nature of the relationship with members and how members interact with Wickham Theatre Trust/Theatre 62.
 - a) To administer membership records
 - b) To maintain financial accounts and records (including the processing of gift aid)
 - c) To provide news and information about events and activities, including via a monthly newsletter
 - d) To manage volunteers e.g. to provide production personnel with lists of members interesting in a specific areas onstage, backstage or front of house
 - e) To publish a list of Full Members contact details from time to time, available to Full Members only

How is personal data held?

17. Membership data is held as hard-copy application forms and uploaded to PCs, Laptops, Data sticks and the Box Office Mobile phone.
18. Additionally hard copy photographs of members who have appeared in Theatre 62 productions are retained at Wickham Theatre Centre.
19. A hard copy list of all members is held securely at Wickham Theatre Centre.
20. A hard copy of the additional safeguarding information referenced at para 10 above is held securely at Wickham Theatre Centre.

What is the legal basis for processing personal data?

21. The basis is:
 - a) Processing is carried out by a not-for-profit organisation;
 - b) Consent of the data subject [i.e. member] has been given; and
 - c) There is no disclosure to a third party without consent.

How is members' consent obtained?

22. New members will be invited to consent via the membership application form.
23. For existing members, their membership forms referenced the use of data under the Data Protection Act 1998.
24. From January 2019, the annual membership renewal form will be revised to include an invitation to actively consent to their data being held.

How are membership lists maintained?

25. Consent will be sought on an annual basis as part of the membership renewal process which formally starts on 1st January each year.
26. A list of Full members is published from time to time for Full Members only.

How long is personal data held?

27. The annual membership renewal period closes on 31st March each year, after which non-renewals are removed from the active membership list and from TicketSource.
28. The retention periods for key documents:

Record Type	Retention
Membership application and renewal forms	24 months (i.e. up until 31st March two years after the renewal period closed)
Membership details held digitally	6 years after the calendar year to which it relates
Box Office bookings	Personal contact data is destroyed within two months of the close of a production
Booking information held on TicketSource	As detailed in Annex 2
Gift Aid declarations and documents	6 years after the calendar year to which it relates
Photographs of productions and events	Indefinitely, including on the Theatre 62 website and social media
Safeguarding documentation (as described at para 10 above)	Day following the end of the run that the child is involved in.
Accident books	5 years from the point of the accident or incident. Records are held by the Chairman.
Minutes of meetings	Indefinitely
Visitors book	Indefinitely

29. A Facebook group is available for members, and members of the public to join. Individuals opt-in to the group themselves and can opt to withdraw at any time.

How can members access their data?

30. If members wish to enquire about how their personal data is used, they can contact the Membership Secretary who may, in turn, consult the Theatre 62 Board.

How are the personal details of children and young people managed?

31. Wickham Theatre Trust/Theatre 62 will take care to ensure that details are made available only to those who need to have them, and that where deemed appropriate, specific parental consent is obtained for this, defining as closely as possible, the limits of sharing. This may be done in consultation with the Safeguarding Officer.
32. Junior Members are under 18 years of age or in full time higher education. Details are maintained in the same way as other members.
33. For young people acting in our productions we maintain additional information (see para 10 above).

Contact details

34. All questions or comments should be addressed to the Wickham Theatre Trust/Theatre 62 Chairman at:-

- chairman@theatre62.org.uk or
- Wickham Theatre Centre, Corkscrew Hill, West Wickham BR4 9BA

35. The Information Commissioner's Office can be contacted via www.ico.org.uk/global/contact-us/email/ or 0303 123 1113 or Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF.

Amendments to this policy

36. This policy may be updated from time to time with the agreement of the Wickham Theatre Trust/Theatre 62 Board.

Publication

37. A copy of this policy is published on the Theatre 62 website at www.theatre62.or.uk and displayed at Wickham Theatre Trust/Theatre 62.

Annexes

Annex 1 – GDPR background

Annex 2 – TicketSource Privacy Policy

Wickham Theatre Trust/Theatre 62

November 2018

Annex 1 – GDPR background

What is it?

The GDPR is the European Union's 'General Data Protection Regulation'. It is set to significantly overhaul and modernise European data protection legislation at a time when information systems and digital business underpin everything we do. It aims to keep individuals' personal data more secure. The GDPR applies across all EU member states and comes into effect on 25 May 2018, replacing the Data Protection Act 1998. The Data Protection Act came into force before the world moved online, and is increasingly out-of-date. The GDPR will introduce tougher rules on how personal information is handled and protected, particularly where it relies on the individual's consent. The GDPR introduces new rights to give individuals greater control over their personal data, such as the right to request data is deleted and for inaccurate data to be rectified. There will be a big increase in the maximum fines the Information Commissioner's Office will be able to impose on data controllers who break the law.

Will it apply after Brexit?

Yes. The Data Protection Bill will transpose the GDPR into UK law, meaning the UK is operates in the same way as the rest of the EU when it comes to processing personal data after the UK leaves the EU.

Is it an update to the 1998 Data Protection Act (DPA)?

It is an evolution of data protection legislation. Many of the GDPR's main concepts and principles are the same as those in the current DPA, but there are new elements and significant enhancements in a lot of areas. The GDPR raises the bar in terms of the criteria needing be met to be able to process personal data. What's the key message?

Accountability, and being able demonstrate our proactive compliance with the GDPR by integrating data protection and privacy throughout our processes and culture.

Annex 2 - TicketSource

The TicketSource Privacy Policy is available at www.ticketsource.co.uk/kb/terms-ofuse/privacy-policy

In April 2018 TicketSource advised Wickham Theatre Trust/Theatre 62 of the following:

“...For customer data (i.e. ticket-buying customers), TicketSource acts as the Data Processor and the Event Organiser [Wickham Theatre Trust/Theatre 62] as the Data Controller.

Storage of Data All data within the TicketSource system is stored securely and we have a range of internal policies and procedures regarding the security of data and also external companies who check the security of our site. TicketSource is registered with the Information Commissioner’s Office (ICO) and we are also required to comply with other data security standards such as PCI DSS (Payment Card Industry Data Security Standard). We are compliant with the ticketing industry standards and best practice stipulated through our membership of STAR (Society of Ticket Agents and Retailers).

How / When is the data reviewed / supplemented / updated Data can be reviewed at any time by the Event Organiser, modified and updated. Data will also be modified if a customer makes a new booking and updates their contact details and marketing preferences. TicketSource would only update customer data if we are requested to by the customer (e.g. contact from customer advising that they have provided an incorrect email address or mobile number for their ticket delivery).

Data Retention Period On our side as the Processor, we will hold customer data securely for one year. Data is held for this period of time to enable us to resolve any charge disputes that may arise. This processing data is completely separate from customer contact details and booking information which can be accessed by the Event Organiser via their account and TicketSource would not delete this data.

As a Data Controller, it will be your decision as to how long you retain your customer data within your TicketSource account. TicketSource will be introducing a range of features to assist Event Organisers to meet their requirements under GDPR.

When / how is the data deleted The data that TicketSource deletes (the booking processing data) will be an automated process built in to the TicketSource system. Mechanisms will be put in place to enable Event Organisers to delete their customer data to comply with their own data retention policy.”

End.