

# BELGRADE THEATRE PRIVACY POLICY

Updated 10 December 2018



## PURPOSE OF POLICY

The Belgrade Theatre is committed to protecting your personal information and being transparent about what information we hold about you. Using personal information allows us to develop a better understanding of our patrons and in turn to provide you with relevant and timely information about the work that we do – both on stage and off. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we and our subsidiaries, collect and use the information we collect from you directly and from third parties.

## OUR DATA PRINCIPLES

- To provide **clear, honest and open** information to customers about how we use their data.
- To give customers the **choice** about how we use their data.
- To use data **appropriately** and in a way that would be reasonably expected by the customer (including suppressing or deleting records once they are no longer required).
- To share customer data with other arts organisations only where the customer has given their **consent** for us to do so, and to limit those organisations to artistic partners who have agreed to sign up to the same principles.
- To be **accountable and responsible**: to take active steps to **protect** customer data from 'data breaches' and informing customers and the information commissioner as required by data protection law, should this occur.
- To have specific **enhanced procedures** for the use of sensitive data (such as data relating to children or disability).
- To ensure our **staff** and **partners** (suppliers and artists) understand these principles and their responsibilities in delivering them.

## WHO WE ARE

Belgrade Theatre Trust (Coventry) Limited (the '**Belgrade Theatre**') is a charity and is funded by the Arts Council England and Coventry City Council as well as various trusts and foundations, individual donors and corporate supporters. Our registered charity number in England and Wales is 219163 and we are also registered as a company in England and Wales under registration number 593331. Our subsidiaries include Belgrade Theatre Enterprises Ltd, through which we run commercial operations such as Belgrade Production Services (BPS) and catering, Belgrade Theatre Productions Limited and Belgrade Theatre Commercial Ltd. This policy is issued on behalf of the Belgrade Theatre and its subsidiaries, so when we mention the Belgrade Theatre, 'we', 'us' or 'our' in this policy, we are referring to the relevant company within our group. The Belgrade Theatre is the data controller and responsible for our website.

The Belgrade Theatre abides by data protection law, including the Privacy and Electronic Communications Regulations 2003 (PECR), the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

## INFORMATION COLLECTION

We collect various types of personal information from you in a number of ways:

When you register on our website, buy tickets or memberships or make a donation, we'll collect and store the personal information you give us. This information may include:

- Your full name, title and date of birth
- Your email address, postal address and telephone number
- Technical data, such as your IP (internet protocol) address, your browser type and version and location data.
- Usage data, such as how you use our websites and services.
- Ticket purchase, membership & donation history
- Gift Aid status
- Payment card details (these are not stored, except if you have requested an Automatic Renewal Membership when they are stored securely by Sage Pay.
- Your contact and communication preferences and any access requirements.

**CCTV:** The Belgrade Theatre has several CCTV cameras throughout the building for security purposes. Access to this footage is restricted to key personnel and is only accessed under strict guidelines in relation to security issues.

**Photography & Video:** We sometimes record our events and activities through photographs and film both for archive purposes and to help spread the word about the type of work we do. Participants, performers and staff are advised of this in their contracts/registration forms. Members of the public are asked to advise the photographer/videographer if they do not wish to be captured and notices to this effect are displayed at relevant events.

**Information from other sources:** We may also collect information about you from other sources:

- Ticket agents who share information with us when you book a ticket for a production or other event at the Belgrade Theatre.
- Other arts organisations or partners that the Belgrade Theatre works with, but only if you have given them your consent. You should check that organisation's privacy notice when you provide your information to fully understand how they will process and safeguard your data.
- Information about how you use our data from analytics providers such as Google.

## SENSITIVE PERSONAL DATA

Data protection law recognises that certain categories of personal information are more sensitive such as health information, genetic and biometric data, information about your race or ethnicity or your religious or philosophical beliefs or sexual orientation, political opinions or trade union membership. We do not usually collect this type of information about our customers unless there is a clear reason for doing so. (For example, we collect health information about participants in our programme of classes and courses or about customers who have access needs; we collect anonymised diversity information on audiences so that we can monitor how well we are doing in attracting a broad audience). Where we collect sensitive data, we will tell you that we are doing so, and will have additional security measures in place to restrict access only to people who need to see this information, and, as with other personal information that we collect, a commitment to deleting this information once the need for storing it has passed.

**Children and Vulnerable Adults:** We are committed to safeguarding children, young people and vulnerable adults and do all we can to ensure that all who work at the Belgrade, including volunteers, whether on stage or joining an education project, are safe and benefit from their experience. Protecting their privacy is important in achieving this.

Anyone under the age of 18 must obtain a parent or guardian's permission every time they provide any personal information to us. We require their signature on any documentation when signing up to any Belgrade project. We also require the carer's signature on similar documentation relating to vulnerable adults.

**Access Information:** Individual access requirements are requested and noted on a customer record in order for us to be able address your needs during a visit and to enable us to monitor how well we are doing in attracting a broad audience. This information will be checked periodically to ensure it is up to date and will be renewed every two years. For further information please visit [www.belgrade.co.uk/your-visit/access-information](http://www.belgrade.co.uk/your-visit/access-information).

## **SAFE STORAGE OF YOUR DATA**

We store personal data under strict safekeeping and confidentiality measures on secure servers operated by the Belgrade Theatre and stored securely by Spektrix, our ticketing, marketing and fundraising systems provider. All Spektrix servers are located in a Tier IV data centre in the UK, which has 24/7 security and tightly restricted access control. Click Spring participant data is stored securely on a bespoke data base with its server based in the UK. Only authorised Belgrade staff who need to process your data have access to it.

## **MARKETING COMMUNICATIONS**

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you (eg when you buy a ticket or membership), because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests (eg marketing communications by post).

We use your data to provide you with marketing communications, news and information about our products, services and events and opportunities to support our charitable work that we feel may interest you.

We aim to communicate with you in a timely, relevant and respectful way. The data that we have stored about you, for example, enables us to take into account what previous events you might have booked for as well as any preferences you may have told us about, so that we can provide you with information that is relevant to you.

When you give us your email address, we will give you the opportunity to receive emails from us. You may also choose to receive information from us by post. You will have opportunity to opt out of receiving further emails or postal communications from us at any time. When you give us your telephone number we may use this to contact you about your booking or to respond to any query you have.

## **HOW WE USE YOUR DATA**

Your data allows us to process any sales transactions, donations or other payments, verify your financial transactions and fulfil any requests – such as applications for memberships, donations, competition entries, participation in campaigns and the provision of information. It also allows us to provide the best possible customer service and to assist us with internal administration.

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- To ensure our website is presented in the most effective manner for you and for your computer and provide customer service in relation to your use of the website.

- In order to improve our website and the services we offer, we may analyse information about how you use it and the content and ads that you interact with.
- In order to provide you with a more personal service we may also use the data we hold about you to classify our audience into groups or segments, using this data and publically available information: this helps us to understand our audiences better and ensure we are sending relevant messages to you.
- To measure and understand how our audiences respond to a variety of marketing activities so that we can ensure our marketing is well targeted, relevant and effective.
- To keep a record of the relationship you have with us, and use that to ensure that the communications we send you are personalised, and relevant to you and your interests
- To provide third parties with statistical information about our users, but this information will not be able to be used to identify any individual user.
- From time to time we conduct surveys and promotions and may request information from you as part of these. Participation in these is entirely voluntary and you therefore have a choice whether or not to disclose any information which might be required.
- The use of CCTV in and around our premises for security purposes to ensure the safety of our visitors and staff.

Any materials or information that you post to the comments section of our website may be visible to other users and is stored on our servers for the purposes of making the site and content available. We do not collect, store or use any personal information contained in any such post for any other purpose. We advise you to be selective about what information you post on the site or that you provide to other users.

As a registered charity we undertake fundraising activities and for a small number of individuals may to seek to supplement booking information with publically available information such as age, place of residence, wealth, career, interests and public donations to other organisations. This helps us understand the background of the people who may choose to support us and helps us to make requests for donations to those who may be willing and able to give.

We may also share your personal data to comply with a legal obligation, such as when you exercise your rights under data protection law or when we have to report or respond to a request from any regulatory or government authority (such as reporting Gift Aid details to HMRC) or to meet national security or law enforcement requirements or prevent illegal activity.

**Sharing your information with others:** We will never share, sell or rent your personal information to any third parties for marketing purposes without your prior consent. Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share your personal information without your consent. We may share personal data securely under the following circumstances and with the following trusted service providers:

- When you have consented for us to share your details with a named partner company eg the producer of a show being performed at the Belgrade.
- Advertisers that require the data to select and serve relevant adverts to you and others. This does not include identifiable information about you.
- Social media sites for the purpose of targeted advertising and data analytics.
- Analytics and search engine providers that help us to optimise our website.
- Payment processors in order to complete your transaction with us.
- Printers and mailing houses to facilitate distribution of print and correspondence.
- Email, data delivery and website hosting service providers.
- Marketing and database service providers to help us to provide you with a more personal service.
- Third party data services who help us to segment and understand our audience so that we can send you the most relevant and targeted communications and tailor pricing.

- Where required to do so by law or when requested by the police or a regulatory or government authority.
- We make sure that any company that provides a service to the Belgrade Theatre which involves the processing of personal data enters into an agreement with us and meets our standards for data security. This agreement will require them not to use personal data for anything other than the clearly defined purpose relating to the service they are providing.

**Transfers outside the European Economic Area (EEA):** The Belgrade Theatre is committed to protecting personal data. We may need to transfer personal data outside the EEA, for example one of our service providers based outside the EEA. If we do this, we will ensure that your privacy rights continue to be protected in line with data protection law and that secure methods of transfer will be used. Please contact us if you would like further information about the specific mechanism used by us when transferring your personal data outside the EEA.

**Your debit and credit card information:** If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more about this standard from the [PCI Security Standards Council](#). If we provide you with the option to store your card details for use in a future transaction this would be carried out in compliance with PCI-DSS and in a way that none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

**Links to Third Party Websites:** The Belgrade Theatre does link to other third party websites such as YouTube and Facebook and other websites of cultural organisations in the area, which have their own terms of usage that you should be fully aware of. Please refer to the Cookies section later in this document for further information. Please note that Belgrade Theatre is not responsible for the privacy policies of third party websites and recommends that users also check the privacy policies of other websites before registering any personal data linked to these sites.

**Failing to provide personal data:** Some of the data we collect is required by law to fulfil our contract we have or are trying to enter into with you (eg booking a ticket). Failure to provide this data may mean that we are unable to complete our service eg if a show is cancelled and we need to get in touch with you to let you know but don't have any contact information.

## **GIVING YOU CONTROL**

When purchasing tickets, membership or any other services from us, you are given the opportunity to opt in to receiving email news and information from the Belgrade Theatre and occasionally also from the named company responsible for the event you are booking for. The Belgrade Theatre will only contact you with news or information or pass on your personal information to the named company if the relevant box has been ticked.

You can update your personal information and communications preferences, or unsubscribe, at any time in the following ways:

- Online by logging into [My Account](#) on the Belgrade website
- Clicking on the 'unsubscribe' link within an email from us
- Emailing us at [dataprotection@belgrade.co.uk](mailto:dataprotection@belgrade.co.uk)
- Writing to us at Data Protection Team, Belgrade Theatre, Belgrade Square, Coventry CV1 1GS

**How long do we keep your information?** We will only keep your personal information in accordance with data protection law for as long as necessary to fulfil the purposes we collected it for, including for the

purposes of satisfying any legal, accounting, or reporting requirements. Where your information is no longer required, we will ensure it is disposed of, deleted or cached in a secure manner.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of the information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

**Your rights:** You have rights under data protection law: the right to be informed, the right of access the right of correction, the right to erasure, the right to restrict processing, the right to transfer data, the right to object and rights in relation to automated decision making including profiling. You may also object to the processing of your personal information for direct marketing purposes. For further details on your rights please see the guidance from the [Information Commissioner's Office](#) (ICO) which is the UK supervisory authority for data protection issues. Please use the contact details for the Belgrade Theatre below if you would like to exercise any of these rights.

**Contact details and further information:** Please get in touch with us if you have any questions about any aspect of this privacy policy:

Data Protection Team  
Belgrade Theatre  
Belgrade Square  
Coventry  
CV1 1GS

[dataprotection@belgrade.co.uk](mailto:dataprotection@belgrade.co.uk)

If you are not satisfied by the way we have handled any issues concerning your data you have the right to make a complaint at any time to the ICO. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance. The ICO's contact details are as follows:

Customer Contact  
Information Commissioner' Office  
Wycliffe House  
Water Lane  
Wilnslow  
SK9 5AF

[casework@ico.org.uk](mailto:casework@ico.org.uk)

## **CHANGES TO OUR PRIVACY POLICY**

Any changes that we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. The date of the last update is noted at the top of the document.

## **UPDATES TO YOUR DATA**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## COOKIES

### What is a cookie?

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. They make it possible for us to provide our online ticketing service and track visitor statistics, such as returning visitors and personalise content options.

### How does The Belgrade use cookies?

Cookies enable us to recognise your computer when you visit our website and can therefore identify members or customers eligible for offers, identify your preferences and tailor your visit to suit your needs more accurately. Cookies also speed up your searches and improve the websites usability for marketing purposes.

### Cookies set on [www.belgrade.co.uk](http://www.belgrade.co.uk) fall into 4 main groups:

1. **Content Management System:** The website does not set any cookies unless the user visits a secure page accessed via a personal log in. It then identifies the visitor's membership level and tracks that user's session.
2. **On-page analytics:** Google Analytics (a free service offered by Google that generates detailed statistics about the visitors to a website) is used to track activity on every page.
3. **Box Office:** our box office is run by Spektrix (a supplier of box office services) who use cookies for essential ticketing operations including identifying and authenticating the user, tying the user's session to the correct user information so a user can be passed correctly through the payment and purchase pathway. Spektrix also sets additional Google Analytics cookies to track purchase paths and values of transactions.

### 'Session' Cookie

This is the cookie used to track customers through the booking process and is essential to make the site function properly.

### 'Authentication' Cookie

The system sets another cookie when users log in – this allows users to start the checkout process, or log in, and then go to a different part of the website. It is also essential to the functioning of the site.

### 'Test' Cookie

Because some browsers (Cough, Safari) don't like Third Party Cookies by default – Spektrix tries to set a test cookie before letting people start the booking process. If this fails, then customers are directed to a cookies help page. It is essential to the functioning of the site.

4. **Social Media** The following social media sites use cookies:

#### YouTube

<http://www.youtube.com/user/belgradetheatre>:

Belgrade Theatre's YouTube channel sets cookies according to YouTube's privacy and cookie policies, which will track users across the YouTube web properties. Additional tracking and personalisation cookies will be set if a user logs in to this service, and this data is then stored by Google (and possibly tied to other Google-stored information).

#### Facebook

<http://www.facebook.com/BelgradeTheatreCoventry>

Belgrade Theatre's Facebook page sets cookies according to YouTube's privacy and cookie policies, which will track users across Facebook web properties. Additional tracking and personalisation cookies will be set if a user logs in to this service, and this data is then stored by Facebook.

## **Twitter**

<http://twitter.com/belgradetheatre>

Belgrade Theatre's Twitter profile page sets cookies for user tracking:

- **Google Analytics** (data received by Twitter)
- **Twitter session and referrer tracking:** Belgrade Theatre's Twitter profile page sets cookies according to Twitter privacy and cookie policies, which will track users across Twitter's web properties. Additional tracking and personalisation cookies will be set if a user logs in to this service, and this data stored by Twitter.

## **Our recommendation:**

The Belgrade Theatre recommends that you allow cookies on your computer to enable us to provide you with the best possible service. If cookies are disabled we cannot guarantee the full functionality of the site.

## **Your rights:**

If you do not wish us to use cookies when you use our website, please adjust your internet browser settings to not accept cookies. Your computer's help function should tell you how to do this. Please note, however, that this may result in your being unable to use some of the facilities on our website.

## **For more information on cookies, please visit:**

[www.whatarecookies.com](http://www.whatarecookies.com)

[www.cookiecentral.com](http://www.cookiecentral.com)

Please note that we are not responsible for information available on these websites.