

## **Privacy Notice for Beartuza Theatre Company**

Beartuza Theatre Company (the “company”, “we”, “us”) is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information that you share, in accordance with the General Data Protection Regulation (GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

*The provision of your personal information to us is voluntary. However, without providing us with your personal information, your use of our services or your interaction with us may be impaired. For example, you may be unable to make an online booking.*

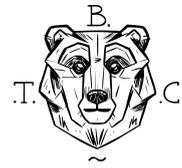
### **We collect personal information about you:**

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

- When you give it to us directly For example, personal information that you submit through our website by making a booking to use our facilities; or signing up for our email newsletter; or personal information that you give to us when you communicate with us by email, phone or letter.
- When we obtain it indirectly For example, your personal information may be shared with us by third parties. To the extent we have not done so already, we will notify you when we receive personal information about you from them and tell you how and why we intend to use that personal information.
- When it is available publicly Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us via Facebook, Instagram, Twitter and Google).

### **What personal information do we use**

We may collect, store and otherwise process the following kinds of personal information:

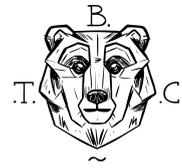


- your name and contact details including postal address, telephone number, email address, emergency contact details and, where applicable, social media identity; your date of birth and gender;
- Characteristics (such as ethnicity, language, nationality, country of birth);
- your financial information, such as bank details and/ or credit/ debit card details,
- personal descriptions and photographs via social media or media release forms;
- Medical information shared by you where you feel it is important for us to know about a certain medical condition;

### **How and why will we use your personal information**

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

- to allow you to make a booking to attend our events
- to otherwise provide you with services, products or information
- to provide further information about our work, services or activities (where necessary, only where you have provided your consent to receive such information);
- to answer your questions/ requests and communicate with you in general;
- to allow you to apply for a job or volunteer role with us;
- to manage relationships with our partners;
- to audit and/ or administer our accounts;
- to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/or law enforcement bodies with whom we may work (for example requirements relating to the payment of tax or anti-money laundering);
- for the prevention of fraud or misuse of services; and/or
- or the establishment, defence and/ or enforcement of legal claims.
- safeguarding children' welfare and providing appropriate pastoral;
- Giving and receive information and references about past, current and prospective people, and to provide references to potential employers of past people we have worked with;
- making use of photographic images of you in company publications, on the company website and on social media channels;
- where otherwise reasonably necessary for the company's purposes, including to obtain appropriate professional advice and insurance for the company.



## **Lawful bases**

The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant:

- Where you have provided your consent for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you email newsletters, or to collect special categories of your personal information).
- Contract: the processing is necessary for a contract with the individual;
- Where necessary so that we can comply with a legal obligation to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
- Where there is a legitimate interest in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights as an individual).

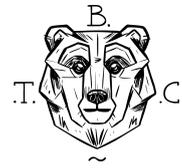
In broad terms, our "legitimate interests" means the interests of running of the company as a business and ensuring the best possible customer service.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and on your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

## **Communications for marketing/promotional purposes**

We may use your contact details to provide you with information about our work, events, services and/or activities which we consider may be of interest to you (for example, about services you previously used, or events and facilities).

Where we do this via email, SMS or telephone we will not do so without your prior consent (unless allowed to do so via applicable law).



Where you have provided us with your consent previously but do not wish to be contacted by us about our work, events, services and/or activities in the future, please let us know by email at [info@beartuza.com](mailto:info@beartuza.com). You can opt out of receiving emails from the company at any time by clicking the “unsubscribe” link at the bottom of our emails.

### **Children’s personal information**

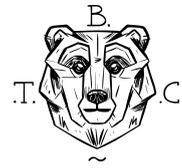
When we process children’s personal information, where required we will not do so without their consent or, where required, the consent of a parent/ guardian. We will always have in place appropriate safeguards to ensure that children’s personal information is handled with due care. Additional information we may collect, store and use for children include:

- Emergency contact relationship, phone numbers and email addresses;
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Images of children engaging in company activities, and images captured by the company with consent;

### **How we store data and how long we keep your personal information?**

The company keep information about you on our computer systems and sometimes on paper. We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records two years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time.

If you request to receive no further contact from us, we may keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.



## **Will we share your personal information**

We do not share, sell or rent your personal information to third parties for marketing purposes. However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Notice.

These parties may include (but are not limited to):

- local government agencies
- funding bodies
- awarding bodies
- professional service providers such as accountants and lawyers;
- parties assisting us with research to monitor the impact/effectiveness of our work, events, services and activities; and
- regulatory authorities, such as tax authorities;

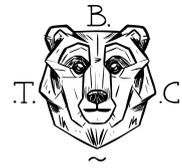
The company is committed to keeping your personal information safe and secure and we have appropriate policies and organisational and technical measures in place to help protect your information.

Your personal information is only accessible by appropriate staff and stored on secure servers which have features to prevent unauthorised access.

## **Exercising your Rights**

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or fundraising purposes or to unsubscribe from our email list at any time. You also have the following rights:

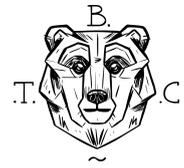
- Right of access – you can email us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
- Right of erasure – at your request we will delete your personal information from our records as far as we are required to do so. In many cases we would propose to suppress further communications with you, rather than delete it.



- Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
- Right to restrict processing – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.
- Right to object – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests basis (see paragraph 4), (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.
- Right to data portability – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.
- Rights related to automated decision-making – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or Member State law to which the company is subject (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

Please note that some of these rights only apply in limited circumstances.

We encourage you to raise any concerns or complaints you have about the way we use your personal information by contacting us using the details provided. You are further entitled to make a complaint to the Information Commissioner's Office – [www.ico.org.uk](http://www.ico.org.uk) For further information on how to exercise this right, please contact us using the details below.



## **Changes to this Notice**

We may update this Notice from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an update notice on our website.

## **Contact**

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the Co-Directors in the first instance.

Co-Directors: Phil Poole & Laura Chetty

Data Controller Email: [info@beartuza.com](mailto:info@beartuza.com)