

Unfolding Theatre Privacy Policy



This policy was last updated & approved by Unfolding Theatre's board: May 2023

Review date: May 2024

Our commitment to you:

Unfolding Theatre is a registered charity (no. 1165182) and a company limited by guarantee (no. 06764666), registered at Arch 6, Stepney Bank, Newcastle upon Tyne, NE1 2NP.

As a data controller, Unfolding Theatre is committed to keeping your personal information (data) safe and meeting its responsibilities under privacy law and the General Data Protection Regulation (GDPR).

This policy explains:

1. Unfolding Theatre's data responsibilities
2. What personal data we collect
3. Why we collect data
4. Our data responsibilities to Children and Young People
5. How data is collected, stored and used
6. Will my data be shared?
7. Your individual data rights
8. Your right to get your data deleted
9. Ongoing review of measures to ensure compliance
10. Questions and how to complain

This policy will be regularly reviewed and Unfolding Theatre will share these updates on its website: www.unfoldingtheatre.co.uk. We will get in touch with individuals directly to let them know about any significant changes.

If you have any queries about the data we hold about you, or would like a copy of the data, please contact: info@unfoldingtheatre.co.uk or by telephone on 0191 580 4901.

1. Unfolding Theatre's data responsibilities

As a data controller, Unfolding Theatre has a legal responsibility to ensure that data is processed lawfully, fairly and in a transparent manner in relation to individuals. This means the board of trustees and all staff at Unfolding Theatre are responsible for adhering to this Privacy Policy and Unfolding Theatre's Data Management Plan, which follows GDPR 2018.

Unfolding Theatre's Data Privacy Officer is currently Executive Producer, Michael Barrass. However, all trustees and staff have a responsibility to ensure that the processes described in this policy are observed.

2. What personal data we collect

As part of its work Unfolding Theatre may need to collect personal information from our audiences, contacts, participants and its workforce.

In this context, personal information refers to any information about an individual, from which that person can be identified. It does not refer to anonymous data. Anonymous data is information where any personal identifiers have been removed. If anonymity is used it will be brought to the individuals' attention via privacy notices (see section 5).

The types of data Unfolding Theatre may collect, and store include:

Audiences:

- Name and contact details
- Demographic information

Contacts:

- Name, address and contact detail

Participants:

- Name and contact detail
- Date of Birth
- Demographic information
- Parental consent (if the participant is under 16)
- Emergency contact details
- Relevant medical history, allergies or food intolerances
- Media release consent (for photographs, film, audio and media content)
- Access requirements
- Evaluation information

Workforce (this includes employees, freelance staff, trustees, volunteers and interns):

- Name, address and contact details
- Date of Birth
- Demographic information
- Proof of identity (including divers license or passport) for processing DBS checks
- HR information, including Tax, National Insurance and pension information
- Bank details

3. Why we collect data

These are the reasons why we collect and store data:

Audiences:

- To send news and promotional information about our work, performances and events
- To send fundraising news
- To better understand the quality and reach of our work performances and events

Contacts:

- To send news and promotional information about our work, performances and events
- To send fundraising news
- To report the impact and reach of our work
- To record those who have supported us financially or through the use of their services

Participants:

- To gain consent for them to take part in projects
- To gain permission for children aged under 16 to take part in projects
- To ensure the safety and wellbeing of participants during projects
- To gain consent to take videos and photos and record audio
- To better understand what it is like to work with us
- To document and showcase those taking part in Unfolding Theatre's experience
- To support the effective administration of the company

Workforce:

- To enter into a contract of employment with an individual
- To support the effective administration of the company
- To adhere to legal requirements for retaining financial and contractual information
- To better understand what it is like to work with us
- To document and showcase those working with Unfolding Theatre

4. Our data responsibilities to Children and Young People

Unfolding Theatre creates projects in participation with children and young people. To do so it may require collecting data about the young people taking part. From 13+ Unfolding Theatre can collect individuals' email addresses. Parents and guardians will be required to provide consent for young people under the age of 16.

We often work in collaboration with children's services, schools and youth groups. In some cases, project partners retain participant information. Unfolding Theatre will specify when it needs to collect participant data. Information may include

- Name
- Contact details (over 13s only)
- Date of Birth
- Parent / guardian details (for under 16s only)
- Demographic information
- Parental/ guardian consent (if the participant is under 16)
- Emergency contact details
- Relevant medical history, allergies or food intolerances
- Media release consent for photographs, film, audio and media content (parental / guardian consent required if the participant is under 18)

- Access requirements
- Participant feedback

5. How is data collected and used?

In some cases, Unfolding Theatre may need to gather consent to collect, store and use individuals' data. If this is the case Unfolding Theatre will provide a **privacy notice** at the time the data is being collected. The **privacy notice** will outline:

- **Who is processing their data:** most of the time this will be Unfolding Theatre. However, there may be occasions where we are collaborating with another organisation who also needs access to this data. This will be clearly outlined in the privacy notice.
- **What data is involved:** the privacy notice will detail all data being requested. We will only request data required for the purposes of the process.
- **The lawful bases and purpose for processing that data:** the privacy notice will include the lawful basis (or bases) for processing that data and detail how and why the data is being processed. We will not share information with other parties unless this is outlined in the privacy notice.
- **The outcomes of data processing:** the privacy notice will detail how and where the data is being stored. Information will be stored for different lengths of time. Each privacy notice will specify how long Unfolding Theatre will store information for.
- **How to exercise their data rights:** each privacy notice will detail an individuals' rights. This is further explained below in section 7.
- **How and where data is stored:** to protect individual's privacy, Unfolding Theatre ensures it uses secure processes, procedures and databases to hold data. Privacy notices will outline how each type of data is secured. General practice includes:
 - use of locked filing cabinets where data is stored on paper or memory sticks
 - shredding of paper data that is no longer required
 - computer log in passwords that are strong, not shared and changed regularly
 - restrictions on staff access levels and use of passwords where data is stored on a cloud-based system or network
 - using third party processors, which includes cloud-based systems, which have been audited and agreed. In instances, where these third party processors are located outside the UK any data transfers will be covered by UK 'adequacy regulations'
 - not saving data to personal computers, mobile phones or similar devices

Unfolding Theatre will keep and process data only for long enough to fulfil the purpose for which it was collected. After that point, it will be disposed of in a secure manner. Each privacy notice will explicitly outline how long information will be held.

Privacy notices will be shared with individuals at the point of contact. Individuals can request copies of privacy notices at any given point.

The lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting info@unfoldingtheatre.co.uk.
- We have a contractual obligation. The consequences of not providing information will be set out in the Privacy notice.
- We have a legal obligation.
- We have a legitimate interest. These will be set in in the Privacy notice.

6. Will my data be shared?

Unfolding Theatre will never sell individuals data. However, it may be processed by limited third parties in line with funding agreements and project partnerships. Where any data sharing occurs, or anonymity is used it will be brought to the individual's attention via privacy notices. Examples of data sharing include:

- Sharing participant, audience and workforce statistics with third parties, including Arts Council England, funders and project partners, to report on its work
- Using third-party provider, Mail Chimp to deliver its newsletters
- Sharing employee's HR information with HMRC and Unfolding Theatre's pension services NEST
- Using third-party provider, Kickstarter to deliver fundraising campaigns
- Using Google Analytics and Audience Agency's web analytics tool to collect information regarding visitor website interactions. (This includes what visitors do on our website, as well as information provided by visitor's computers, i.e. browser type. This data is anonymised, and Unfolding Theatre will not attempt to find out the identities of those visiting its website).
- Using Good CRM, our Customer Relationship Management (CRM) system to manage data.

When visiting Unfolding Theatre's website, the individual consents to the use of cookies, files placed on the computer by a website to collect internet log data and learn about the behaviour of visitors. For more information about cookies, including how to turn them off, visit www.aboutcookies.org

Unfolding Theatre may share information about individuals with law enforcement agencies and other organisations or individuals if required to by law.

7. Your individual data rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. This is explained below in Section 8.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@unfoldingtheatre.co.uk, or telephone 0191 580 4901 or Unfolding Theatre, Arch 6, Stepney Bank, Newcastle upon Tyne, NE1 2NP if you wish to make a request.

8. Your right to get your data deleted

The right to get your data deleted is also known as the right to erasure. You can ask Unfolding Theatre to delete that data that it holds about you by contacting us at info@unfoldingtheatre.co.uk, or telephone 0191 580 4901 or Unfolding Theatre, Arch 6, Stepney Bank, Newcastle upon Tyne, NE1 2NP.

Unless an exception in data protection law applies, Unfolding Theatre will comply with your request.

Where your data has been made public – such as social media networks, in reports or on our website, Unfolding Theatre will take reasonable steps to inform people with responsibility for these sites to erase links or copies of that data.

9. Ongoing review of measures to ensure compliance:

Meeting the obligations of the GDPR to ensure compliance will be an ongoing process. Unfolding Theatre will regularly renew its policy and processes to ensure it complies. Unfolding Theatre will:

- i. Maintain documentation/evidence of the privacy measure plans, implementation and records of compliance in conjunction with its Data Management Policy
- ii. Train employees on privacy and data protection matters
- iii. Review this policy on an annual basis
- iv. Review any data requests received to inform the annual review of this policy
- v. Carry out periodic surveying with user groups to ensure this policy meets their needs.

10. Questions and how to complain

If you have any questions, or wish to make a complaint about how we have used your data, please contact us at:

Unfolding Theatre
Arch 6
Stepney Bank
Newcastle upon Tyne
NE1 2NP

Telephone: 0191 580 4901

Email: info@unfoldingtheatre.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>