



Unfolding Theatre Privacy Policy

Unfolding Theatre (data controller) is committed to keeping personal information (data) safe and meeting its responsibilities under privacy law. The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. Unfolding Theatre have a legal responsibility to ensure that data is processed lawfully, fairly and in a transparent manner in relation to individuals (data subject).

This policy outlines:

- Unfolding Theatre's responsibilities as a data controller
- What personal data we hold
- How we use and store that data (data processing)
- The rights of the data individual
- Organisations we may share data with for specific purposes (data processes)

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.

About Unfolding Theatre:

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

Unfolding Theatre's responsibilities as a data controller:

As a data controller Unfolding Theatre is responsible for demonstrating compliance with the GDPR principles. Unfolding Theatre's Data Protection Officer (DPO) is Company Producer, Morag Iles, but all staff have a responsibility to ensure that the processes described in this policy are observed.

What is personal information?

Personal information, or personal data, refers to any information about an individual (data subject) 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.

What personal data Unfolding Theatre may hold:

A data subject is an individual who may have interacted with Unfolding Theatre. Data we may hold includes:

- Names of individuals and their email addresses as required:
 - to sign up to Unfolding Theatre's mailing list
 - attend an event
 - make a donation(This may include information available through services used to process registers or donations i.e., Eventbrite or Kickstarter)
- Names of individuals and their postal addresses as required to receive our annual report
- Personal information as required if Unfolding Theatre are responsible for an individual's safeguarding and welfare during in a workshop. Personal data includes:
 - name
 - DOB
 - contact details
 - medical information
 - food intolerances(or the personal details of the parent or guardian of a child under the age of 16)

This information is not required if Unfolding Theatre is hosting a workshop through another organisation that holds responsibilities for participants.

- Personal information as required in the process of contracting an employee. In addition to the personal information listed above this may include:

- DBS checks
- HR information
- bank details.
- Workforce* demographic data as required in accordance with its funding agreement with Arts Council England. This includes:
 - gender
 - ethnicity
 - sexuality
- *workforce includes employees, freelance staff, trustees, volunteers and interns
- Feedback provided on workshops, events or performance. This may include:
 - name
 - age
 - post code
- Photographs, video or audio taken during an Unfolding Theatre project or event, and the associated permissions/ consent form required to obtain these.
- Communications with Unfolding Theatre (such as emails and notes of phone calls) and information sent via email (including CVs and applications)
- That publically available via social media activity and interactions with Unfolding Theatre (such as an individual's Twitter handle, posts tagging Unfolding Theatre and the individuals location)

How Unfolding Theatre uses data:

Unfolding Theatre will collect and store data to:

- Ensure interested parties and individuals are up to date with upcoming productions, events and opportunities, and have an annual review of work achieved
- Safeguard participants taking part in workshops, productions or events
- Support the effective administration of the organisation
- Document those that have taken part in Unfolding Theatre's experiences
- Use as advocacy for the organisation
- Learn from participants, audiences and workforce experiences, supporting organisational development
- Record those that have given money or services in support of Unfolding Theatre
- Keep in touch with future collaborators
- Support Unfolding Theatre to report its impact

How Unfolding Theatre stores data:

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 should include:

- use of locked filing cabinets or similar where data is stored on paper, memory sticks or other physical items
- shredding of paper data that is no longer required
- computer log in passwords that are strong, not shared and changed regularly
- restrictions on access levels and use of passwords where data is stored on a cloud-based system or network
- only using third party processors, which includes cloud-based systems, which has been audited and agreed
- 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.

Conditions for processing data:

Unfolding Theatre will provide audit trails to support the conditions of data processing. These include:

- Consent (when an individual give consent)
- Contract (in order to be able to deliver or enter in to a contract)

- Legal obligation (where the law requires it)
- Vital interests (to protect someone's life)
- Public task (to perform a task in the public interest or for official functions)
- Legitimate interests (necessary for your legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests)

Privacy notices should make conditions for processing data obvious.

Children/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. Parents and guardians will be required to provide consent and information for children under the age of 16.

Unfolding Theatre often work in collaboration with children's services, schools and youth groups. In these instances, project partners would retain participant information. Unfolding Theatre will only require collecting participant information if they are the organisation hosting the workshop/ event. Information may include:

- medical details
- school information
- access requirements
- feedback

Information may be passed to emergency services if necessary.

Data sharing and use of anonymous data:

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 bought to the individuals attention via privacy notices.

Unfolding Theatre may share data with third party organisations that support its data processing. We will conduct an audit of third party processors which details:

- the type of data share
- the reasons for sharing it
- how data is transferred securely
- how we know the processor complies with data protection law
- that the processor does not transfer data outside of the European Economic Area (EEA) and if so that their data protection is at least equal to that of companies inside the EEA (e.g. IOS Certificate or US Security Shield) and how data subjects are informed of this

Any third party organisation with which data is being shared with will be named in the privacy notices.

Examples 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 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).

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.

Privacy notices:

Unfolding Theatre aims to ensure that individuals are aware that their data is being processed, and that they understand:

- Who is processing their data
- What data is involved
- The purpose for processing that data and where it is stored
- The outcomes of data processing
- How to exercise their rights
- How long Unfolding Theatre will hold onto specific data

Privacy notices will be shared with individuals at the point of contact and made available online.

Individual access requests:

All individuals who are the subject of data held by Unfolding Theatre are entitled to:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations

If you would like a copy of some or all of the data Unfolding Theatre hold about you – please contact our DPO at: info@unfoldingtheatre.co.uk

On the receipt of a subject access request Unfolding Theatre will have 30 days to respond. This process will be managed by the DPO, who will ensure that the subject is aware of the procedure, receiving confirmation of when this process has begun, receiving the requested information within the 30-day period.

The right to erasure:

Data subjects have the right to be ‘forgotten’. If requested Unfolding Theatre will erase the data held on individuals as far as reasonably possible.

If you would like to request Unfolding Theatre delete data, it holds – please contact our DPO at: info@unfoldingtheatre.co.uk

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:

- 1) Maintain documentation/evidence of the privacy measure plans, implementation and records of compliance
- 2) Regularly test the privacy measures implemented
- 3) Use the results of testing, other audits, or metrics to demonstrate both existing and continuous compliance improvement efforts
- 4) Train employees on privacy and data protection matters

Any questions:

If you have questions about your personal data or our privacy policy please contact our Data Protection Officer (DPO) Morag Iles at info@unfoldingtheatre.co.uk or phone 0191 5804 901. Alternatively, write to Unfolding Theatre at:

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