

Data Management Policy

How we use the data we collect

The Theatre Chipping Norton Ltd is committed to protecting you and your family's personal information when you are using any of our services. We want the services we provide to be safe and enjoyable environments for our audiences, customers and visitors. This Privacy Notice relates to our use of any personal information we collect from you via the following services:

- our website
- our booking website provided by Tickets.com
- social media
- our emails to you
- your visit to The Theatre Chipping Norton

It also relates to our use of any personal information you provide to us by phone, SMS, email, in letters and other written correspondence, and in person.

In order to provide you with access to book tickets with us and stay in touch with us about what we're doing, we need to collect information about you.

This Privacy and Cookies Policy explains the following:

- what information The Theatre Chipping Norton Ltd may collect about you;
- how The Theatre Chipping Norton Ltd will use information we collect about you;
- when The Theatre Chipping Norton Ltd uses your details to contact you;
- when The Theatre Chipping Norton Ltd will disclose your details to anyone else;
- your choices and rights regarding the personal information you provide to us;
- the use of Cookies on our website & booking pages and how you can reject Cookies.

The Theatre Chipping Norton Ltd is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act 1998 and the General Data Protection Regulation 2018. No website can be completely secure; if you have any concerns that your customer account could have been compromised, e.g. someone could have discovered your password, please get in touch straight away by contacting the Box Office.

In addition to our service provider Tickets.com, our website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, and are also likely to use Cookies, and we therefore urge you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by Cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

Who we are and who is collecting it?

The Theatre Chipping Norton Ltd is an independent charitable company set up to promote theatre and performing arts. This is done through the creation, presentation and education or a range of performing arts

We aim to be entirely upfront and open about the customer data that we use. Collecting this data makes it easy for you to book shows and events, keep up to date with our activities, and engage with us in other ways or supporting

our continued future. We do not obtain any personal data that we think would be likely to cause individuals to object to or complain about, but we are always open to discuss with you any of the information we hold.

It is possible that The Theatre Chipping Norton Ltd may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you. In the event that any Data submitted by Users will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your Data deleted or withheld from the new owner or controller.

The information that we collect, process and hold

Personal Information

- Full Name and Title
- Email Address
- Phone Numbers and Mobile Number
- Date of Birth
- Delivery Address
- Billing Address
- Access requirements
- Genre Preferences
- Membership Level
- Purchase History
- Donation History and Pledges
- Gift Aid status
- Gender
- Marketing Preferences including for Third Parties
- Card Details (for purchases and for your Card Wallet)
- Email and Newsletter records including emails sent, emails opened by you, and links opened by you
- Publicly Accessible Profile Information from the internet including Facebook, Instagram and Twitter
- Images of you when you visit the Theatre (CCTV or as a member of the audience for promotional use)

Anonymised Information

- IP address
- Operating system
- Cookies
- Google Analytics

Why we collect and use this information

We use your data for these specific purposes, unless you ask us not to:

- To enable you to book and pay for tickets via our website, over the telephone and in person by setting up a customer account in your name.
- To enable you to donate to us with a single payment or regular agreement.
- To enable us to contact you to provide important information in advance of your booked event, such as details of the location of the event or if the event has been cancelled.
- To enable us to email you with a survey after seeing a show in order to evaluate the success of an event and improve the theatre's programme and facilities.
- To enable us to contact you about similar shows, events and events from the services provided by The Theatre Chipping Norton Ltd
- To enable us to email you with our upcoming shows and events at The Theatre Chipping Norton Ltd, providing we have your consent to do so.

- To enable us to call you with details of how you can support us, or of specific offers or events that may be of interest.
- To enable us to text you with offers or details of upcoming shows and events.
- To enable us to contact you about how you can support us, if we have your consent to do so, or to thank you for donating to us and telling you how your money will be well spent.
- To share your personal information with other organisations who would like to contact you, if you have provided your consent.
- To allow you to enquire about our services; book your event, and keep in touch with you about all the necessary arrangements before and after the event date.
- To evaluate the services and events we provide, in order to improve them for the future; and to report on them to our funders like Arts Council England and West Oxfordshire District Council.
- To identify recurring visitors and to analyse their browsing habits within the website (Cookies)
- To store saved shopping carts as you navigate around the website (Cookies)
- To identify people on our system who may be interested in becoming a member, supporting the charity or increasing their support, based on their ticket purchasing and donation history.
- On occasion, for promoting our shows and events or for archival or reference purposes, by the use of photographs and videos taken of our audiences and theatre-users.
- For storing CCTV images of people within the premises for security
- To help us investigate complaints, legal claims or important incidents

How we collect and use this information

We use our website to sign you up to our E-Newsletter database. Our website is provided by Red Box & Feast.

We use The Theatre Chipping Norton website as a processor for receiving enquiries regarding events and services.

We use Tickets.com to process our Box Office ticketing system, and to report on your order history, donation history, membership status, and to show trends in sales patterns.

We use Crowd Connect and Mailchimp to send newsletters and keep in touch via email.

We use Audiences Agency, an independent audience insight agency service.

We may use other similar services provided by other parties, but which do not adversely affect your rights on the terms of this notice.

We do not use any services that include automated decision making of any significance to the individual. The consequences of being subjected to the automated profiling systems that we have in place is limited to specific marketing or fundraising campaigns directed at specific customer types based on their purchase and donation history or post code area. This will not override your marketing preferences which can be updated at any time within your customer account on the website or by contacting box office.

The legal basis on which we use this information

There are three legal bases under which we may process your data.

Contract Purposes

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data.

To confirm your booking by way of a confirmation email, sending your tickets to you in the post, or to confirm your identity when collecting your tickets.

To enable us to contact you to provide important information in advance of your booked event, such as details of the location of the event or if the event has been cancelled.

To enable you to book and pay for tickets and merchandise via our website, over the telephone and in person by setting up a customer account in your name.

Explicit Consent

When appropriate, we will ask you for your explicit consent before using your personal information in that specific situation. We will update your consent periodically. You have the right to withdraw consent at any time, and this can be done via your Customer Account on the website or by contacting our Box Office:

- To enable us to contact you about how you can support us.
- To enable us to contact you about
- To thank you for donating to us and telling you how your money will be well spent.
- To share your personal information with other organisations who would like to contact you, if you have provided your consent.

Legitimate Business Interests

We collect and process your personal information for purposes that are in our legitimate organisational interests. We do this carefully, and in a way that we believe there is no overriding prejudice to you by using your personal information in this way. You have the right to object, amongst other rights explained later in this document.

- To enable us to contact you about similar products and services (shows, events and merchandise) available at The Theatre Chipping Norton.
- To enable us to email you with a survey after seeing a show in order to evaluate the success of an event and improve the theatre's programme and facilities.
- To enable us to call you with details of how you can support us, or of specific offers or events that may be of interest, providing you are not registered on the Telephone Preference Service (TPS).
- To enable us to text you with offers or details of upcoming shows and events.
- To allow you to enquire about our Restaurant, Wedding and Event services; book your event, and keep in touch with you about all the necessary arrangements before and after the event date.
- To drive evaluation and statistics of the services and events to provide, in order to improve them for the future, and report them anonymously to our funders like Arts Council England and West Oxford District Council.
- To analyse the data we hold about you in order to identify and prevent fraud.
- To analyse the way in which our website is used and the content and links that you interact with, in order to improve our website services.
- To store saved shopping carts as you navigate around the website.
- To analyse the way in which our emails to you are received by you, and the content and links that you interact with, in order to improve our communications with you.
- To analyse the data we hold about you to ensure that the content and timing of our communications to you are as relevant as possible.
- To maintain notes of our customers according to customer booking and donation history, and other personal customer account data that you provide us, as well as publicly available internet research for the purposes of our marketing communications to you, and to enable us to communicate in a relevant way with you, but not to make any automated decisions based on profiling of any consequence to you whatsoever.
- To share anonymised information to support arts marketing commissioned in England (Arts Council England, Audience Finder) to enable the delivery of high-quality art.
- To promote our shows and events by the use of photographs and videos taken of our audiences.
- To record and store CCTV media within the premises for security purposes.
- Children

We take the protection of children and their personal data very seriously. For this reason, as we are unable to verify parental consent, no-one under the age of 13 is allowed to use our website or services. Children under the age of 13 must ask their parents or an adult to make bookings for them. For our Take Part department, when we ask you for additional personal information, this may be for children as well. We therefore provide you with an additional Privacy Notice at this point so that you are informed about what information we will be asking for and how we will be using it.

Web Browser Cookies

The Theatre Chipping Norton Ltd and Tickets.com may set and access Cookies on your computer. A Cookie is a small file that resides on your computer's hard drive and often contains a unique identifier and is accessible only by the website that placed it there, not any other sites. You may restrict your internet browser's use of Cookies.

You may delete Cookies, however you may lose any information that enables you to access the website more quickly. You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered.

For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of services available on the website.

Collecting this information

Whilst the majority of the personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis, and we will make this clear to you when we collect the data from you by marking the 'Required' fields. Anything that does not say 'Required' next to it is voluntary.

Not providing information

You may access certain areas of the website without providing any data at all. However, to use all services and systems available on the website and booking website you may be required to submit customer account information or other data.

You do not have to provide us with all the information we may ask you for. It is up to you.

Any information that we ask for other than those listed below is entirely voluntary. Not providing any of the voluntary information will not preclude you from any of the products or services we offer or effect you in any other way.

In order to sign up to our eNewsletter, we only require:

- First Name
- Last Name
- Email Address

In order to create a customer account, we only require:

- First Name
- Last Name
- Email Address
- Phone Number
- Billing Address

Once a customer account has been created, we need to store the following information on your account:

- Purchase History
- Membership Level
- Donation History
- Gift Aid declaration

In order to book and pay for tickets, we only require:

Your customer account details, and –

- Card Type
- Card Number (our staff members are not able to see your full card number)
- Expiry Date
- Start Date (only if required by your bank)
- Issue Code (only if required by your bank)
- Security Code (we never store your 3 or 4 digit security code)

All debit and credit card information is processed securely, and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). We allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS.

Storing this information

We store your personal data securely using suitable physical, electronic and managerial procedures to safeguard and secure all and any customer data and personal information. We will ensure that any third parties we use for processing your personal data do the same. We limit internal access to your personal data to only those who require it, and provide all our staff with Data Protection and Information Security training. We ensure that high standards of security and protection are met by abiding by our Data Protection Policies and Procedures, and these are governed by the Senior Management Team and the Board of Trustees.

Under The Theatre Chipping Norton's Confidentiality Code of Conduct, all our staff are required to protect your information, and inform you of how your information will be used. This includes, in most circumstances, allowing you to decide if and how your information can be shared. Everyone working for The Theatre Chipping Norton is subject to the duty of confidentiality. Information provided in confidence will only be used for the purposes advised and consented to by the service user, unless it is required or permitted by the law.

Whenever your information is stored online, we have a data sharing agreement with the data processor which states the requirements of high level security for your personal data. Should there be a breach of this data, they are obliged to inform us immediately and we will then inform you if it is necessary under Data Protection guidance. It is your right to be informed.

When we do send you information, we do so securely and are committed to reporting any breaches of data during its transit. Whenever possible all information that identifies you will be removed.

EU-U.S. Privacy Shield Compliance

Our service provider Tickets.com and its controlled U.S. subsidiaries comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Tickets.com has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>. Tickets.com also maintains an affirmative commitment to the U.S.-Swiss Safe Harbor Framework and its principles, which will not be affected by our participation in the Privacy Shield.

In compliance with the Privacy Shield Principles and the U.S.-Swiss Safe Harbor Framework, Tickets.com commits to resolve complaints about our collection or use of your personal information. European Union and Swiss individuals with inquiries or complaints regarding our Privacy Shield or Safe Harbor policies should first contact Tickets.com at:

Tickets.com, LLC
535 Anton Boulevard, Suite 250
Costa Mesa, California,
92626
Attn: Legal Department

Tickets.com has further committed to refer unresolved Privacy Shield and Safe Harbor complaints to International Center for Dispute Resolution ("ICDR"), the international division of the American Arbitration Association, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit ICDR at <http://info.adr.org/safeharbor> for more information or to file a complaint. The services of ICDR are provided at no cost to you. To the extent practicable, hearings will be conducted via telephone or other electronic means intended to facilitate a hearing forum. Any in-person arbitration proceeding will take place in New York, New York, USA. Upon conclusion of the arbitration, any court having jurisdiction over the matter may enter judgment on any award issued in the arbitration.

As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to you in order to address residual complaints not resolved by any other means. Tickets.com is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

In the UK the company responsible is Tickets.Com Limited a subsidiary of Tickets.Com Inc. The address is Tickets.com Ltd, 252 Upper Third Street, Milton Keynes, Buckinghamshire, MK9 1NP.

Data is kept on their database but supplied to us for purchasing tickets. In using the service you consent to The Theatre Chipping Norton accessing your data as this is necessary for the purchase of tickets.

Tickets.com may use aggregated information and statistics for the purpose of monitoring website usage in order to help us develop the website and our services and may provide such aggregated information for third parties. However, these statistics will not include any information that can be used to identify any living individual.

Tickets.Com is an international business and all its computer and information systems are web based. The servers housing the web based information are physically situated in the United States of America and in giving personal data to Tickets.Com you consent to the transfer of data out of the European Economic Area (EEA) in particular to the United States of America.

Web servers and other means of processing data used by Tickets.Com will have in place at all times appropriate technical and organisational security measures to ensure a level of security appropriate to the harm that might result from unauthorised or unlawful processing or the accidental loss of, destruction or damage to personal data.

Data stored on the web servers of Tickets.Com may be accessed by subsidiaries in other countries. Details of these countries and their Data Protection Policies are set out on the Tickets.com website and most of those countries are either countries within the EEA or countries which adhere to data protection standards which are deemed to be sufficient by the EEA. The USA does not have the same standards of protection for personal data as in the EEA but there as elsewhere, Tickets.Com maintain standards of privacy in accordance with the International Standards set out at the commencement of this Privacy Policy

For information regarding Privacy Policy as applied to the UK please contact us by email at UKPrivacyPolicy@tickets.com You can also obtain information from the office of the Information Commissioner who administers Data Protection on 01625 545745 or email data@dataprotection.gov.uk.

Your rights

You have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- object to the processing of your data where The Theatre Chipping Norton Ltd is relying on its legitimate interest as the legal grounds for processing;
- prevent processing of your personal data;
- port your data using an open format document, like a .csv Excel document;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

The best person to contact regarding data protection at The Theatre Chipping Norton Ltd is

Paul Fordham, General Manager.

admin@chippingnortontheatre.com

The Theatre Chipping Norton Ltd,
2 Spring St, Chipping Norton, OX7 5NL
01608 642349

Right to lodge a complaint

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at ico.org.uk/concerns.

How to access your personal information (Subject Access)

You have the right to see the information that The Theatre Chipping Norton Ltd holds about you, and why we hold it. You also have the right to rectify any inaccurate information we hold about you. Requests must be made in writing (not verbally). You will need to provide:

- Full name, address, email address, phone number, customer ID, so that your identity can be verified against our records and your information located
- Copy of Photographic ID
- An indication of what information you are requesting to enable us to locate this in an efficient manner

A request for information must be made with the appropriate person:

Paul Fordham, General Manager.
admin@chippingnortontheatre.com
The Theatre Chipping Norton Ltd,
2 Spring St, Chipping Norton, OX7 5NL
01608 642349

There is no fee for Subject Access Requests. The Theatre Chipping Norton reserves the right in certain situations to refuse the request, otherwise we will comply within one calendar month.

The request's response will cover the following detail;

- Any personal data that is being processed
- A description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people
- A copy of the information comprising the data; and details of the source of the data

If you require Subject Access Requests or our response to them in braille or any other format please contact us and we will happily arrange this as quickly as possible.

Changes to Privacy Policy

The Theatre Chipping Norton Ltd reserves the right to change this Privacy Policy from time to time. The most current version of the policy will govern our use of your personal information. In the event that The Theatre Chipping Norton Ltd, at its sole discretion, determines that updates to the Privacy Policy constitute a material change, we may inform you of such changes in a notice published via the Services or send an email to the email address associated with your User account. Notwithstanding the foregoing, The Theatre Chipping Norton Ltd is under no obligation to notify a User regarding changes to this policy, and thus Users should periodically visit this page to review the then current Policy to which you are bound.

Retention periods

We will only retain information for as long as necessary. Records are maintained in line with our retention schedule which determines the length of time records should be kept. We are bound by law to retain certain financial records, and these circumstances override our other retention periods.

We will ask you to check and update your contact preferences periodically so that we know our database is up to date. You can withdraw your consent, or make changes to your contact preferences at any time.

We actively maintain customer data, including communications with you, previous records or ticket, donations, membership status and other purchase histories to allow you to sign in to your account even if you have not booked with us for a while, and to continue to allow you to update and make changes to your marketing preferences. This also allows us to look up your customer account if you book with our box office staff. You are also able to view your previous orders when you log in to your customer account on our website. If your account has had no activity for some time, before it has gone 6 years with no activity, it will be made inactive from our database, thereby restricting

access to the information, but it is stored indefinitely such that for any subsequent enquiry or activity you make we are able to link back to a single unique record that we hold for you on our system.

We retain CCTV and Promotional images for 5 years.

We retain Cookies information for 5 years.

We retain any complaints, queries or written communications with you for 5 years.

When personal data is no longer required by the organisation, it is deleted or securely destroyed.

You have the right to request we remove the information we store about you. Please contact us, and we will be happy to arrange this for you if you want us to. Any objections you make to any processing of your data will be stored against a record on our system so that we can comply with your request.

Who we share personal information with and how this will affect you

We do not sell any of your information for the purposes of marketing or fundraising. We do not share your personal information with third parties, unless you have given us specific consent to do so, or if we are required to do so in order to deliver a Box Office service at another venue, or due to our obligations to comply with current legislation and bank transactions, or our duty to comply with a Court Order.

However, we do employ the services of other party's software and services in order to collect and store your personal information, for example we use Tickets.com as our ticketing system software provider for booking tickets and creating customer accounts that can be accessed on our website. The providers of such services may have access to certain personal data provided by you. Any data used by such parties is used only to the extent required by them to perform the services that The Theatre Chipping Norton requests. Any use for other purposes is strictly prohibited within a data sharing agreement between us and the provider. Furthermore, any data that is processed by third parties must be processed within the terms of this policy and in accordance with the United Kingdom Data Protection Act 1998 and General Data Protection Regulation 2018.