

Privacy Policy

Wokingham Theatre is a Registered Charity No 292448. The Theatre is also registered with Companies House, No 01933168 whose registered office is at Twyford Road, Wokingham, Berkshire, RG40 5TU.

This Privacy Policy sets out the basis on which any personal data we collect from you or that you provide to us will be processed by us. Please read the following Privacy Policy to understand how we use and protect the information that you provide to us.

Wokingham Theatre respects your privacy and is committed to protecting your personal data. It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

1. Contacting Wokingham Theatre

For the purpose of UK data protection laws, the data controller in respect of any personal data that we collect about you or which you provide to us is Wokingham Theatre. If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy, our contact details are as follows:

Postal Address:
Data Controller
Wokingham Theatre
Twyford Road
Wokingham
Berks
RG40 5TU
Email: data@wokinghamtheatre.org.uk

2. Data that we collect about you

2.1 Wokingham Theatre collects information about patrons and members in order to promote its plays, transact ticket sales, collect subscriptions and communicate with its members.

The information record held in our database about patrons contains:

- First and last name
- Postal address
- Telephone number
- Email address
- Ticket purchase history
- Season ticket holder (yes/no)

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The information held about members contains all of the above plus:

- Joining date
- Renewal date
- Class of membership (full/student/life)

We also hold members' preferences/skills, such as acting, directing, front of house, lighting, sound.

Wokingham Theatre does not store payment card information in the database. After selecting seats, the online box office opens a window to a payment portal that processes our transactions.

2.2 At the time of registration, the person is explicitly accepting Wokingham Theatre will retain and use the above information for legitimate business interest purposes in accordance with this Privacy Policy.

3. How we collect your data

We collect your information when you decide to interact with us. We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our [Cookies Policy](#) below for further details.

4. Use of Your Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Direct marketing communications to you via email. You have the right to withdraw your consent to marketing at any time.

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5. Purposes for which we will use your personal data

We have set out in the table below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data:

Data used and purpose	Lawful basis for processing including basis of legitimate interest
To register you as a new member we use your Identity, Contact and Transaction Data	Performance of a contract with you
To register you as a new website user we use your Identity and Contact Data	Performance of a contract with you
To process and deliver your event booking including: (a) Managing payments, fees and charges (b) Collecting and recover money owed to us (c) Sending you information about the event we use your Identity, Contact, Transaction and Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To maintain and manage your membership with us including: (a) Managing payments, fees and charges (b) Collecting and recover money owed to us we use your Identity, Contact, Transaction and Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you including: (a) Notifying you about changes to our terms and conditions or privacy policy (b) Asking you to leave a review or take a survey <u>In addition, for Members:</u> (c) Sending Member communications such as, depending on your membership grade, Member Newsletter, Training and Events news (d) Informing you of reports, consultations, guidelines and industry advocacy (e) informing you of Wokingham Theatre events (f) Providing you with sector updates which we think will be of interest to you we use your Identity, Contact, Profile and Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our offerings) (d) Necessary for our legitimate interests of keeping our members informed of trends and news in the theatre industry and of the work we our doing for members.
To include you in our Wokingham Theatre Directory of Members we use your Identity and Contact Data	(a) Performance of a contract with you
If you are a member or have attended an event to enable you to partake in an event, production or complete a survey we use your Identity, Contact, Profile, Usage and Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our offerings, to develop them and grow our business)

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To publicise our events (including by way of images or sound recordings of you when you have attended our events) we use your Identity Data	(a) Performance of a contract with you (as a core purpose of our events is to facilitate networking so delegate name and organisation are circulated amongst delegates, on the web, with speakers and sponsors) (b) Necessary for our legitimate interests to promote our events and our work and grow our business.
To share of online resources for our events e.g. by way of a secure forum we use your Identity Data	Necessary for our legitimate interests to run our events
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) we use your Identity, Contact and Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you we use your Identity, Contact, Profile, Usage, Technical and Marketing and Communications Data	Necessary for our legitimate interests (to study how customers use our offerings, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, presentation, marketing, customer relationships and experiences we use your Technical and Usage Data	Necessary for our legitimate interests (to define types of customers for our offerings, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about events or productions that may be of interest to you we use your Identity, Contact, Technical, Profile and Usage Data	Necessary for our legitimate interests (to develop our offerings and grow our business)

6. Disclosure of your personal data

6.1 Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, or as set out in a separate privacy notice to you, we will not share, sell or distribute any of the information you provide to us.

6.2 We may disclose your personal information to any person to whom disclosure is necessary to enable us to enforce our rights under this Privacy Policy or under the Terms and Conditions or under our membership contract with you. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or, in respect of messages from us.

8. Cookies

By accessing and using the Wokingham Theatre website you are agreeing to the use of “cookies” and similar technologies by Wokingham Theatre. Please read the information below as it explains what cookies are and how we use cookies on the Wokingham Theatre website.

8.1 What are cookies?

A cookie is a small file of letters and numbers that is downloaded on to your computer or any other device used to visit a website (e.g. a mobile phone). Cookies are used by many websites to enable the website to work efficiently and to distinguish you from other users in order to improve your browsing experience. For example, cookies can remember your preferences so you do not have to input the same data each time you visit a website, record what you have put in your shopping basket, and count the number of people viewing a website to analyse whether the website is being used or whether the content needs to be updated.

8.2 How do we use cookies?

We use:

- Cookies which are strictly necessary in order to enable you to use features you have requested on the website, eg to log-in to the members’ area of the website and to enable you to pay for courses through the website.
- Performance cookies which let us know how members and non-members use the website so that we can continue to improve the website, e.g. which pages are most popular and which areas of the website are less relevant to visitors. These cookies do not collect personal information so you cannot be identified by the information collected.
- Functionality cookies allow us to remember your choices and personalise your experience on the site, e.g. by welcoming you by name when you are logged in, and by remembering your membership status as, for example, a “full member”.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Please see our Cookies Policy for information on how we use cookies on our website.

9. Third party sites

Our website may contain links to websites, plug-ins and applications that are operated by third parties. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control those websites and this Privacy Policy does not apply to those websites. Please consult the terms and conditions and privacy policy of those third party websites to find out how they collect and use your personal data and to establish whether and for what purpose they use cookies.

10. Data security

10.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those officers of Wokingham Theatre, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. However, you acknowledge that data transmission over the internet is inherently insecure and that we cannot guarantee the security of data sent over the internet.

10.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Storing your data

11.1 We will only retain your personal data 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.

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

11.3 Your information will only be held for a reasonable period or as long as the law requires or permits.

12. Third party processors

12.1 We may share your information with service providers who work on behalf of Wokingham Theatre for the performance of any contract we enter into with them or you, for example payment processing, printers and mailing houses, marketing agencies, database services, website hosting or email delivery service.

13. Your Rights

13.1 You have rights under the UK General Data Protection Regulation (GDPR) laws in relation to your personal data as set out below. If you wish to exercise any such right in the appropriate circumstances, please contact us using the information provided above:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

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- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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13.2 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

13.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13.4 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13.5 You can obtain further information concerning your rights under GDPR from the Information Commissioner's Office at <https://ico.org.uk/>

14. Changes to our Privacy Policy and your duty to inform us of changes

We reserve the right to make changes to the Privacy Policy from time to time. Any such changes to our Privacy Policy will be posted on this page of our website. We recommend that you consult this page frequently so that you are aware of our latest Privacy Policy from time to time.

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.

Last updated: 17 March 2021