

# BELGRADE THEATRE PRIVACY POLICY

Updated May 2018



## PURPOSE OF POLICY

The Belgrade Theatre is committed to protecting your personal information and being transparent about what information we hold about you. Using personal information allows us to develop a better understanding of our patrons and in turn to provide you with relevant and timely information about the work that we do – both on stage and off. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we and our subsidiaries, collect and use the information we collect from you directly and from third parties.

## OUR DATA PRINCIPLES

- To provide **clear, honest and open** information to customers about how we use their data.
- To give customers the **choice** about how we use their data.
- To use data **appropriately** and in a way that would be reasonably expected by the customer (including suppressing or deleting records once they are no longer required).
- Only share customer data with other organisations where the customer has given their **consent** for us to do so, and to limit those organisations to artistic partners who have agreed to sign up to the same principles (ie. Not for commercial gain).
- To be **accountable and responsible**: to take active steps to **protect** customer data from 'data breaches' and informing customers and the information commissioner should this occur.
- To have specific **enhanced procedures** for the use of sensitive data (such as data relating to children or disability).
- To ensure our **staff** and **partners** (suppliers and artists) understand these principles and their responsibilities in delivering them.

## WHO WE ARE

The Belgrade Theatre is a charity and is funded by the Arts Council England and Coventry City Council as well as various trusts and foundations, individual donors and corporate supporters. Our registered charity number in England and Wales is 219163 and we are also registered as a company in England and Wales under registration number 593331. Our subsidiaries include Belgrade Theatre Enterprises Ltd, through which we run commercial operations such as Belgrade Production Services (BPS) and catering, Belgrade Theatre Productions Limited, Belgrade Theatre Commercial Ltd.

The Belgrade Theatre abides by Privacy and Electronic Communications Regulations (PECR) and General Data Protection Regulations (GDPR).

## INFORMATION COLLECTION

We collect various types of information from you in a number of ways:

When you register on our website, buy tickets or make a donation, we'll store the personal information you give us. This information may include:

- Your full name, title and date of birth
- Your email address, postal address and telephone number
- Your IP (internet protocol) address
- Ticket purchase & donation history
- Gift Aid status
- Payment card details (these are not stored, except if you have requested an Automatic Renewal Membership when they are stored securely by Sage Pay, an approved third party)
- Your contact and communication preferences

Non personal information includes your IP address, web pages accessed and files downloaded. This information does not tell us anything about who you are or where you live, but it does help us monitor and improve our service.

**CCTV:** The Belgrade Theatre has several CCTV cameras throughout the building for security purposes. Access to this footage is restricted to key personnel and is only accessed under strict guidelines in relation to security issues.

**Photography & Video:** We sometimes record our events and activities through photographs and film both for archive purposes and to help spread the word about the type of work we do. Participants, performers and staff are advised of this in their contracts/registration forms. Members of the public are asked to advise the photographer/videographer if they do not wish to be captured and notices to this effect are displayed at relevant events.

## **SENSITIVE PERSONAL DATA**

Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about our patrons unless there is a clear reason for doing so. (For example, we collect health information about participants in our programme of classes and courses; we collect anonymised diversity information on audiences so that we can monitor how well we are doing in attracting a broad audience). Where we store sensitive data, we will tell you that we are doing so, and will have additional security measures in place to restrict access only to people who need to see this information, and a commitment to deleting this information once the need for storing it has passed.

**Children and Vulnerable Adults:** We are committed to safeguarding children, young people and vulnerable adults and do all we can to ensure that all who work at the Belgrade, including volunteers, whether on stage or joining an education project, are safe and benefit from their experience. Protecting their privacy is important in achieving this.

Anyone under the age of 18 must obtain a parent or guardian's permission every time they provide any personal information to us. We require their signature on any documentation when signing up to any Belgrade project. We also require the carer's signature on similar documentation relating to vulnerable adults.

**Access Information:** Individual access requirements are requested and noted on a customer record in order for us to be able address your needs during a visit and to enable us to monitor how well we are doing in attracting a broad audience. This information will be checked periodically to ensure it is up to date and will be renewed every two years. For further information please visit [www.belgrade.co.uk/your-visit/access-information](http://www.belgrade.co.uk/your-visit/access-information).

## **SAFE STORAGE OF YOUR DATA**

We store personal data under strict safekeeping and confidentiality measures on secure servers operated by the Belgrade and stored securely by Spektrix, our ticketing, marketing and fundraising systems provider. All

Spektrix servers are located in a Tier IV data centre in the UK, which has 24/7 security and tightly restricted access control. Participant data is stored securely on a bespoke server in the UK. Only authorised Belgrade staff who need to process your data have access to it.

## **MARKETING COMMUNICATIONS**

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests (eg postal communications).

We use your data to provide you with marketing communications, news and information about our products, services and events and opportunities to support our charitable work that we feel may interest you.

We aim to communicate with you in a timely, relevant and respectful way. The data that we have stored about you, for example, enables us to take into account what previous events you might have booked for as well as any preferences you may have told us about.

When you give us your email address, we will give you the opportunity to receive emails from us. You may also choose to receive information from us by post. You will have opportunity to opt out of receiving further emails or postal communications from us at any time. When you give us your telephone number we may use this to contact you about your booking.

## **SUMMARY OF HOW WE USE YOUR DATA**

Your data allows us to process any sales transactions, donations or other payments, verify your financial transactions and fulfil any requests – such as applications for memberships, donations, competition entries, participation in campaigns and the provision of information.

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- To ensure our website is presented in the most effective manner for you and for your computer and provide customer service in relation to your use of the website.
- In order to improve our website we may analyse information about how you use it and the content and ads that you interact with.
- To keep a record of the relationship you have with us, and use that to ensure that the communications we send you are personalised, and relevant to you and your interests
- To provide third parties with statistical information about our users, but this information will not be able to be used to identify any individual user.

From time to time we conduct surveys and promotions and may request information from you as part of these. Participation in these is entirely voluntary and you therefore have a choice whether or not to disclose any information which might be required.

Any materials or information that you post to the comments section of our website may be visible to other users and is stored on our servers for the purposes of making the Site and content available. We do not collect, store or use any personal information contained in any such post for any other purpose. We advise you to be selective about what information you post on the site or that you provide to other users.

**Sharing your information with others:** Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent.

**Your debit and credit card information:** If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more about this standard from the [PCI Security Standards Council](#). If we provide you with the option to store your card details for use in a future transaction this would be carried out in compliance with PCI-DSS and in a way that none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

**Links to Third Party Websites:** The Belgrade Theatre does link to other third party websites such as YouTube and Facebook and other websites of cultural organisations in the area, which have their own terms of usage that you should be fully aware of. Please refer to the Cookies section later in this document for further information. Please note that Belgrade Theatre is not responsible for the privacy policies of third party websites and recommends that users also check the privacy policies of other websites before registering any personal data linked to these sites.

## **GIVING YOU CONTROL**

When purchasing tickets you are given the opportunity to opt in to receiving news and information from The Belgrade Theatre by either post and/or email and occasionally also to the company responsible for the event you are booking for. The Belgrade Theatre will only pass on your Personal Information if the relevant box has been ticked.

You can update your personal information and communications preferences, or unsubscribe, at any time in the following ways:

- Online by logging into [My Account](#) on the Belgrade website
- Clicking on the 'unsubscribe' link within an email from us
- Emailing us at [dataprotection@belgrade.co.uk](mailto:dataprotection@belgrade.co.uk)
- Writing to us at Data Protection, Belgrade Theatre, Belgrade Square, Coventry CV1 1GS

Unless you notify us otherwise, by unsubscribing or opting out of particular preferences, your personal information could be kept for a maximum of seven years for marketing purposes. We will continue to send you communications about transactions you make with us, for example when you purchase tickets, or relating to active memberships you hold with us or information about your visit.

**Access to information:** You have the right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected or erased. You may also object to the processing of your personal information for direct marketing purposes. For further details on your rights see the guidance from the [UK Information Commissioner's Office](#) (ICO). Please use the contact details at the end of this policy if you would like to exercise any of these rights.

**Contact details and further information:** Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Data Protection Team  
Belgrade Theatre  
Belgrade Square  
Coventry  
CV1 1GS

[dataprotection@belgrade.co.uk](mailto:dataprotection@belgrade.co.uk)

If you are not satisfied by the way we have handled any issues concerning your data you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's contact details are as follows:

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

casework@ico.org.uk

## **CHANGES TO OUR PRIVACY POLICY**

Any changes that we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. The date of the last update is noted at the top of the document.

## **COOKIES**

### **What is a cookie?**

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. They make it possible for us to provide our online ticketing service and track visitor statistics, such as returning visitors and personalise content options.

### **How does The Belgrade use cookies?**

Cookies enable us to recognise your computer when you visit our website and can therefore identify members or customers eligible for offers, identify your preferences and tailor your visit to suit your needs more accurately. Cookies also speed up your searches and improve the websites usability for marketing purposes.

### **Cookies set on [www.belgrade.co.uk](http://www.belgrade.co.uk) fall into 4 main groups:**

- 1. Content Management System:** The website does not set any cookies unless the user visits a secure page accessed via a personal log in. It then identifies the visitor's membership level and tracks that user's session.
- 2. On-page analytics:** Google Analytics (a free service offered by Google that generates detailed statistics about the visitors to a website) is used to track activity on every page.
- 3. Box Office:** our box office is run by Spektrix (a supplier of box office services) who use cookies for essential ticketing operations including identifying and authenticating the user, tying the user's session to the correct user information so a user can be passed correctly through the payment and purchase pathway. Spektrix also sets additional Google Analytics cookies to track purchase paths and values of transactions.

### **'Session' Cookie**

This is the cookie used to track customers through the booking process and is essential to make the site function properly.

### **'Authentication' Cookie**

The system sets another cookie when users log in – this allows users to start the checkout process, or log in, and then go to a different part of the website. It is also essential to the functioning of the site.

### **'Test' Cookie**

Because some browsers (Cough, Safari) don't like Third Party Cookies by default – Spektrix tries to set a

test cookie before letting people start the booking process. If this fails, then customers are directed to a cookies help page. It is essential to the functioning of the site.

**4. Social Media** The following social media sites use cookies:

#### **YouTube**

<http://www.youtube.com/user/belgradetheatre>:

Belgrade Theatre's YouTube channel sets cookies according to YouTube's privacy and cookie policies, which will track users across the YouTube web properties. Additional tracking and personalisation cookies will be set if a user logs in to this service, and this data is then stored by Google (and possibly tied to other Google-stored information).

#### **Facebook**

<http://www.facebook.com/BelgradeTheatreCoventry>

Belgrade Theatre's Facebook page sets cookies according to YouTube's privacy and cookie policies, which will track users across Facebook web properties. Additional tracking and personalisation cookies will be set if a user logs in to this service, and this data is then stored by Facebook.

#### **Twitter**

<http://twitter.com/belgradetheatre>

Belgrade Theatre's Twitter profile page sets cookies for user tracking:

- **Google Analytics** (data received by Twitter)
- **Twitter session and referrer tracking:** Belgrade Theatre's Twitter profile page sets cookies according to Twitter privacy and cookie policies, which will track users across Twitter's web properties. Additional tracking and personalisation cookies will be set if a user logs in to this service, and this data stored by Twitter.

#### **Our recommendation:**

The Belgrade Theatre recommends that you allow cookies on your computer to enable us to provide you with the best possible service. If cookies are disabled we cannot guarantee the full functionality of the site.

#### **Your rights:**

If you do not wish us to use cookies when you use our website, please adjust your internet browser settings to not accept cookies. Your computer's help function should tell you how to do this. Please note, however, that this may result in your being unable to use some of the facilities on our website.

**For more information on cookies, please visit:**

[www.whatarecookies.com](http://www.whatarecookies.com)

[www.cookiecentral.com](http://www.cookiecentral.com)

Please note that we are not responsible for information available on these websites.