



Updated May 2018

# PRIVACY STATEMENT

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**CARLISLE  
FRINGE**

**BIG BURNS  
SUPPER**

*Queer Haggis*

**HIGH  
TEA**  
A VINTAGE  
EXPERIENCE

**TRANSFORM  
DUMFRIES**

DUMFRIES  
**YOUTH  
THEATRE**

**LE HAGGIS**

DUMFRIES  
**COMMUNITY  
CHOIR**

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Review date: Nov 2018

Electric Theatre Workshop | Eskdale House Crichton Business Park Bankend Road Dumfries

## Our privacy statement

At Electric Theatre Workshop we are committed to protect and respect your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679, dated May 16<sup>th</sup>, 2018. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our products and to our sales, marketing and customer contract fulfilment activities. It also applies to individuals seeking a job at Electric Theatre Workshop.

Electric Theatre Workshop is the data controller and our Data Protection Officer can be contacted by email [privacy@electrictheatreworkshop.com](mailto:privacy@electrictheatreworkshop.com)

## Who we are

Electric Theatre Workshop is a cultural producer based in the borderlands area of Dumfries & Galloway, and Cumbria. Our projects help to animate life in Southern Scotland and North West England. We produce arts festivals like Big Burns Supper in the winter and Carlisle Fringe Festival in the summer. We give talent a platform, and we present programmes of arts and culture for over 50,000 people a year. We provide training and skills development for emerging artists and producers, and we weekly participatory projects like Dumfries Youth Theatre and Dumfries Community Choir. Our work helps to inspire our community and create experiences by coming together.

## When do we collect personal data about you?

- When you are using our products.
- When you interact with us in person, through correspondence, by phone, by social media, or through our websites.
- When we collect personal information from other legitimate sources, such as third-party data aggregators, Electric Theatre Workshop marketing partners, public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.
- We may collect personal data if it is of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected we make sure an assessment is made, ensuring that there is an established mutual interest between you and Electric Theatre Workshop

## **Why do we collect and use personal data?**

We collect and use personal data mainly to perform direct sales, direct marketing and customer service. We also collect data about suppliers, partners and persons seeking a job or working in our company.

## **We may use your information for the following purposes:**

- Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners' products and services. This communication is subscription based and requires your consent.
- Send you information about the products and services that you have purchased from us.
- Perform direct sales activities in cases where legitimate and mutual interest is established.
- Provide you with creative content about one of our shows or events.
- Reply to a 'Contact me' or other web forms you have completed on one of our Electric Theatre Workshop websites (e.g. to download a programme).
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Provide you with access and services related to Electric Theatre Workshop or our associated projects like Big Burns Supper Festival, Carlisle Fringe Festival, Dumfries Youth Theatre, Dumfries Community Choir or Producers of the Future.
- Provide access to our Customer Support team at the Electric Theatre Workshop.
- Perform contractual obligations such as order confirmation, tickets, reminders, and similar. The contract will always be with Electric Theatre Workshop.
- Notify you about any disruptions to our services (system messages).
- Contact you to conduct surveys about your opinion on our products and services.

- Process a job application.
- Process casting information, or an opportunity to take part in one of our projects.

## **Our legal basis for collecting personal data**

### **Collecting personal data based on consents**

- The collection of personal data based on consent from the data subject will be done by using “Consent Forms” that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems.

### **Collecting personal data based on contracts**

- We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers.

### **Collecting personal data based on legitimate interest**

- We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between Electric Theatre Workshop and the individual person has been identified. This legal basis is primarily related to our sales and marketing purposes. We will always inform individuals about their privacy rights and the purpose for collecting personal data. This will apply if you are purchasing a ticket to our shows and events which provides us with a legitimate interest to store your data.
- If you have purchased a ticket with us your data is stored as part of a customer record which is maintained on the Ticketsolve system, which operates its merchant banking through the Realex Exchange. Whether you buy a ticket from us online, over the phone, or in person we will always process your data using this same system.
- If you buy a drink at one of our bars, or you purchase something from our shops and you pay by card, this will be process on the World Pay system. Your details will be stored by World Pay and not Electric Theatre Workshop.

- We keep records of attendances at our workshops, events or classes and we ask you to sign in and out. This data is maintained by officers of the company who are trained in GDPR and data protection.

## **What type of personal data is collected?**

- We collect name, phone number, title and email address, in addition to your company's name and contact information. We may also collect feedback, comments and questions received from you in service-related communication and activities, such as meetings, phone calls, documents, and emails. From our websites we may collect IP-address and actions taken on the site.
- If you upload photos or videos, add posts or comments, etc. on our social media sites the information can be read by anyone with access to the social media sites and used for purposes over which Electric Theatre Workshop or you have no control. Therefore, Electric Theatre Workshop is not responsible for any information you submit to our social media sites.
- If you apply for a job at Electric Theatre Workshop, we collect the data you provide during the application process.
- Electric Theatre Workshop does not collect or process any special categories of personal data, such as public unique identifiers or sensitive personal data.

## **How long do we keep your personal data?**

- We store personal data for as long as we find it necessary to fulfil the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve possible problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.
- If you have participated in one of our programmes we will store your personal details until 12 months after you have completed the activity you took part in.

- This means that we may retain your personal data for a reasonable period after your last interaction with us. When the personal data that we have collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

## Your rights to your personal data

### You have the following rights with respect to your personal data:

- The right to request a copy of your personal data that Electric Theatre Workshop holds about you.
- The right to request that Electric Theatre Workshop corrects your personal data if inaccurate or out of date.
- If you are a customer or partner and you have registered a profile on our C website, you may update your user profile by logging into settings and selecting “Edit Profile”.
- The right to request that your personal data is deleted when it is no longer necessary for Electric Theatre Workshop to retain such data.
- The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communications:
- If you want to withdraw your consent to e-marketing, please make use of the link to manage your subscriptions included in our communication. Please note that you may still receive system messages and administrative communications from Electric Theatre Workshop such as order confirmations, system messages and notifications about your account activities.
- The right to request that Electric Theatre Workshop provides you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
- The right to request a restriction on further data processing in case there is a dispute in relation to the accuracy or processing of your personal data.

- The right to object to the processing of personal data in case data processing has been based on legitimate interest and/or direct marketing.

Any query about your Privacy Rights should be sent to [privacy@electricheatreworkshop.com](mailto:privacy@electricheatreworkshop.com)

Or by calling us on 01387 271820 or 01228 812 611

## The use of cookies and beacons

- We use cookies and web beacons ('Website Navigational Information') to collect information as you navigate the company's websites. Website Navigational Information includes standard information from your web browser, such as browser type and browser language; your Internet Protocol ("IP") address; and the actions you take on the company's websites, such as the web pages viewed, and the links clicked.
- This information is used to make our websites work more efficiently, as well as to provide business and marketing information to the owners of the site, and to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purposes of understanding how visitors use a website. Cookies and similar technologies help us tailor our website to your personal needs, as well as to detect and prevent security threats and abuse. If used alone, cookies and web beacons do not personally identify you.

## Do we share your data with anyone?

- We do not share, sell, rent, or trade your information with any third parties without your consent, except from what is described below:

### **Third-party Service Providers working on our behalf:**

- We may pass your information on to our distributors, agents, sub-contractors and other associated organizations with the purpose of them providing services to you on our behalf.

**Third-party Product Providers we work in association with:**

- We work closely with various third-party product providers to bring you a range of products and services designed to meet your extended needs related to CRM (e.g. apps available in our App Store). When you enquire about or purchase one or more of these products, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered with them. In some cases, our third-party product providers will be acting as data processors of your information and, therefore, we advise you to read their Privacy Policy and sign a Data Processing Agreement. These third-party product providers will share your information with us, which we will use in accordance with this Privacy Statement.

**If required by law:**

- We will disclose your personal information if required by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

**Use of sub-contractors (processors and sub-processors)**

- We may use sub-contractors to process personal data on our behalf, we are responsible for making sure they commit themselves to adhere to this Privacy Policy and applicable data protection legislation by signing a Data Processing Agreement.
- If the sub-contractor processes Personal Data outside the EU/EEA area, such processing must be in accordance with the EU Privacy Shield Framework, EU Standard Contractual Clauses for transfer to third countries, or another specifically stated lawful basis for the transfer of personal data to a third country.
- If a new sub-contractor is signed or a change of sub-contractor is performed related to our CRM Online service, the customers will be notified in line with our Terms of Service.

**Changes to this Privacy Statement**



- Electric Theatre Workshop reserves the right to amend this Privacy Statement at any time. The applicable version will always be found on our websites. We encourage you to check this Privacy Statement occasionally to ensure that you are happy with any changes.
- If we make changes that significantly alter our privacy practices, we will notify you by email or post a notice on our websites prior to the change taking effect.

## Your right to complain with a supervisory authority

- If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact [privacy@electrictheatreworkshop.com](mailto:privacy@electrictheatreworkshop.com)
- If you remain dissatisfied, then you have the right to apply directly to your national supervisory authority for a decision. The supervisory authorities can be contacted at:

### England

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

### Scotland

Information Commissioner's Office  
45 Melville Street  
Edinburgh  
EH3 7HL  
Tel: 0303 123 1115

Email: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)

