

## Privacy Policy for Members of Carlton Operatic Society

At Carlton Operatic Society we are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect in the course of your membership will be processed by us. Members are those who pay a membership fee and are of the following types: acting, non-acting, full time student, and post-show. This may also include co-opted members and life members.

For the purpose of data protection legislation, the data controller is Carlton Operatic Society.

This policy is overseen by the administrator. If you have any queries, complaints or requests please contact the administrator at [administrator@carltonoperatic.com](mailto:administrator@carltonoperatic.com).

### What information do we collect about you?

We will collect and process data about you such as your:

- Name
- Address
- Date of birth
- Contact details
- Emergency contact details
- Voice type
- Past performance experience
- Musical theatre related training and qualifications
- Measurements
- Absence record

We may also take photographs and video recordings of you and ask for your biography.

We will also collect and process data about you which is sensitive, called '**special category personal data**' and we will take extra care to make sure that this is kept safe:

- Special education needs and disability information
- Allergy information
- Dietary requirements
- Medical/health information

And any other data which we may notify you of from time to time.

### Where do we get this information from?

This is information about you that you give us directly. You may do this by filling in forms or by corresponding with us by phone, email or otherwise.

## Why do we collect this information?

We use this information in the following ways:

### Pursuant to a contract:

- to plan weekly rehearsals and any aspect of our productions; and
- to send you details of our auditions and rehearsals and communicate with you, where necessary, about any aspect of our productions or your membership to the society.

### On the basis of your consent:

- Where we rely on your consent for processing this will be brought to your attention when the information is collected from you.

### In our legitimate interests for the purpose of:

- informing you about Carlton Operatic Society social events and opportunities;
- supporting your health and well-being whilst you are taking part in rehearsals and performances;
- where you are a non-acting member and have expressed an interest in helping out with aspects of this year's production, contacting you about any opportunities that may arise we think you might be interested in;
- contacting you about any publicity opportunities or information e.g. radio interviews, TV appearances;
- assisting you in your application for your NODA awards;
- assessing your eligibility for and providing you with a Warsop award;
- monitoring your attendance at rehearsals;
- carrying out and reviewing surveys and communicating with you generally in our legitimate interest for improving Carlton Operatic Society as a society;
- our legitimate interest in respect of litigation, including bringing or defending legal claims;
- accounting and financial planning purposes e.g. to keep track of your membership payments, and payments for social events;
- where you have ordered tickets through the society, processing your ticket orders; and
- **Photographs and videos.** You may be included in images and/or video recordings taken in the course of our rehearsal and performance process. Uses may include use in promotional materials, our production programmes, social media posts, our patrons' newsletters, or other similar purposes.

You have the right to object to processing carried out for our legitimate interests. See the [What are your rights?](#) section below for more information.

### To comply with legal requirements relating to:

- data protection;
- health and safety;
- mandatory reporting obligations;
- disclosures required by law enforcement agencies; and
- any other legal obligations placed on us from time to time.

We may inform you of additional purposes for processing your information when that information is collected from you.



## How long do we keep hold of your information?

We only store your information for as long as is required for the purpose it was collected. For much of your information, this will be for the length of your membership with us and then for a period of 6 years thereafter.

Any special category data you provide us with will be destroyed following the end of our production.

If you would like to know how long we hold a particular piece of information then please let us know.

## Who might we share your information with?

Where information is shared with third parties we will only share the information required for the purpose it is being shared.

For the purposes set out in the 'Why do we collect this information?' section above, we may share your personal information with:

- our sub-processors and service providers including, our insurance providers, IT service providers (e.g. DropBox), costumiers, printers, our accountant and legal advice provider; and
- specific staff members at the Theatre Royal Nottingham (for the processing of society ticket orders and our legal obligations around the risk assessment).

Additionally, we will disclose your personal information to the relevant third party:

- To third parties when it is necessary for the establishment, exercise or defence of legal claims.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply contractual terms or other agreements; or to protect the rights, property, or safety of ourselves, our members, our supporters, or others.

## How is your data stored and kept secure?

At Carlton Operatic Society, we take your safety and security very seriously and we are committed to protecting your personal information. Carlton Operatic Society keeps your information safe by using a number of technical and organisational security measures. These include password protections, retention and deletion processes and the restriction of access to information, for example any information you give us, especially information regarding your health will be shared on a strictly need to know basis.

We may transfer your data outside the European Economic Area ("EEA"). We will only do so if adequate protection measures are in place in compliance with data protection legislation. We currently use the IT service provider DropBox which is hosted in the USA which is Privacy Shield certified.

## What are your rights?

You have the following rights. You can exercise these rights at any time by contacting us at [administrator@carltonoperatic.com](mailto:administrator@carltonoperatic.com).

You have the right:

- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- where processing of your personal data is based on consent, to withdraw that consent at any time;
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;



- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate grounds for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing);
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above.

## What we ask of you

- **Keeping your information accurate and up to date.** If your information changes for any reason, for example if you change your name, address or contact details, then you should inform us of the change as soon as possible so that we can ensure your information is kept accurate and up to date.
- **Personal data that you provide about another person.** If you provide us with information about another person, for example, about your dependents, next of kin or emergency contacts, you confirm that you have informed them of our identity, the purposes for which their personal data will be processed (e.g. for emergency contacts purposes).

## Definitions

**Personal Data:** Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, such identifiers including name, identification number, location data or online identifier.

**Special Categories of Data** includes data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

## Changes to our privacy policy

We may amend this privacy policy from time to time; for example, to keep it up to date or to comply with legal requirements. We recommend that you check this policy regularly to ensure you keep up-to-date with any changes.

## How to contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to the administrator at: [administrator@carltonoperatic.com](mailto:administrator@carltonoperatic.com).

In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>.

Policy last updated: 9<sup>th</sup> Oct 2018.

