

# SPOTLIGHT MUSICAL THEATRE

## PRIVACY & COOKIE POLICY

1.1 SPOTLIGHT MUSICAL THEATRE is committed to protecting and respecting your privacy.

1.2 This privacy policy is issued on behalf of the Spotlight Musical Theatre – A “Not for Profit” Society

1.3 When we mention “Spotlight Musical Theatre”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant organisation responsible for processing your data.

1.4 This policy (together with our terms of use and any other documents referred to on it) 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 carefully to understand our views and practices regarding your personal data and how we will treat it.

1.5 For the purposes of the General Data Protection Regulation and Data Protection Act 2018:

1.5.1 in respect of the personal data of the users of our website, our members, volunteers, we act as a data controller.

## 2. Information we may collect from you

We may collect and process some or all of the following types of data about you:

2.1 Information that you provide by filling in forms on our site [www.spotlightbeccles.org.uk](http://www.spotlightbeccles.org.uk)  
This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services.

2.2 More specifically, the information we collect may include the following – your name, telephone number, address, email address, date of birth.

2.3 If you contact us, we may keep a record of that correspondence.

2.4 We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

2.5 Details of your visits to our site and your general internet usage including, traffic data, location data, weblogs and other communication data.

### **3. Our basis for processing and use of your data**

3.1 We only use your personal data when the law allows us to. Most commonly, we use your personal data where we need to perform or are about to perform a contract with you, where it is in our legitimate interests (such as developing our products/services, promoting our charitable aims, administering our website, network security, maintaining our records and the preventing fraud), where we need to comply with a legal obligation, where it is substantially made public or with your consent.

3.2 Where you enquire about becoming a member of Spotlight Musical Theatre (or where you already are a member and are renewing your membership), the basis for our processing of your personal data will be to enter into and perform the contract between you and us.

3.3 Where you enquire about our services, the basis for our processing of your personal data will be to enter into and perform the contract between you and us including to process invoices.

3.4 Where you sign up for one or more of our newsletters, the basis for our processing of your personal data will be your consent which you will have given at that time – but will be free to withdraw at any time.

3.5 We may from time to time send you information about events (including the regional and annual General Meetings), products, services or other matters that we believe will be of interest to you. The basis for our processing of your personal data there will be legitimate interest and/or your consent.

3.6 Where you participate in interactive features on our website our basis for processing your personal data will be to enter into or perform a contract with you, our legitimate interests or your consent.

3.7 We process technical information about you to protect our business and website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data where it is necessary for our legitimate interests and/or to comply with a legal obligation. We also process technical and other information about you to help deliver relevant website content and advertisements to you as well as measuring the effectiveness of the advertising. Our legal basis for doing so is that it is in our legitimate interests.

3.8 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **4. Cookies**

4.1 Our site uses cookies which may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to provide you with a good experience when you browse our site, improve our site and to deliver a better and more personalised service.

4.2 By continuing to use our site, you are agreeing to our use of cookies.

4.3 Please note that our advertisers may also use cookies, over which we have no control – you can turn them off, but not through us.

4.4 You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

4.5 You may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org) where you can find comprehensive information on cookies and how to manage them.

## **5. How do we collect your personal data**

5.1 We use different methods to collect data from and about you including through:

5.1.1 Direct interactions – You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you register with us, request a product or service, give us feedback, or request marketing.

5.1.2 Automated technologies or interactions – As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. [We may also receive technical data about you if you visit other websites employing our cookies.] Please see our cookie policy [LINK] for further details.

5.1.3 Third parties or publicly available sources – We will receive personal data about you from various third parties and public sources such as analytics providers, advertising networks, social media and other publically available sources, payment, financial and delivery service providers and your employer/organisation.

## **6. Where we store your personal data**

6.1 We do not transfer or store your personal data outside the European Economic Area ("EEA").

6.2 We employ appropriate security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. All information you provide to us is stored on secure servers.

6.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **7. Disclosure of your information**

7.1 We may disclose your personal information within our group.

7.2 We may disclose your personal information to other third parties including:

7.2.1 In the event that we transfer or merge any of our activities or assets to another organisation, your information may be disclosed to our new business partners or owners.

7.2.2 If we are under a duty to disclose or share your personal data in order to comply with a legal obligation (such as to HMRC or the Charity Commission), or in order to enforce or apply our terms of use and terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Spotlight Musical Theatre, our members, customers, or others (such as to our professional advisers including our lawyers and accountants). For the avoidance of doubt sharing information for these purposes may include exchanging information with other companies and/or organisations for the purposes of fraud protection and credit risk reduction.

7.2.3 Our third party service providers, such as those providing IT and system administration services, based in the EEA.

7.2.4 Permitted third parties for marketing purposes.

## **8. Your rights**

8.1 You may have the right to:

8.1.1 request access to your personal data,

8.1.2 request correction of your personal data,

- 8.1.3 request deletion of your personal information,
- 8.1.4 request the restriction of processing of your personal information,
- 8.1.5 object to processing of your personal information where we are relying on a legitimate interest,
- 8.1.6 request the transfer of your personal information to another party,
- 8.1.7 make a complaint to the Information Commissioner's Office (ICO),
- 8.1.8 withdraw your consent to processing at any time.

8.2 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **9. Keeping your information up-to-date, how long we will keep your data, opting-out, automated decision making and changes to this policy.**

9.1 Please let us know if your information changes as it is important that the personal information we hold about you is accurate and up to date.

9.2 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. As a general rule, we will keep your information for a maximum of 7 years after you cease to be a member or have no other financial or other dealings with us. We keep your information for this period so that we have a record of you should you wish to recommence your relationship with Spotlight Music Theatre.

9.3 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you

9.5 We keep this privacy policy under review. Any changes will be posted on this page and, where appropriate, notified to you by e-mail.

