

## The Stevenage Lytton Players Data Privacy Policy

### 1. About this Policy

1.1 This policy explains when and why we collect personal information how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website ([www.lyttonplayers.co.uk](http://www.lyttonplayers.co.uk)) or our Society noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

### 2. Who are we?

2.1 We are The Stevenage Lytton Players (the Society). We can be contacted at The Lytton Theatre, Vardon Road, Stevenage, Herts SG1 5PZ; tel: 01438 357407.

### 3. What information we collect and why?

Type of information	Purposes	Legal basis of processing
<b>Members</b>		
Member's name, address, telephone numbers, e-mail address(es).	Managing the member's membership of the Society	Performing the society's contract with the member. For the purposes of our legitimate interests in operating the Society.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the society's contract with the Member.
Gender	Provision of adequate facilities for members  Reporting information to local and national bodies of which we are registered members (Associates)	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of the legitimate interests of associates to maintain diversity data
Photos and videos of members	Putting on the Society's website and social media pages and using in press releases	For the purposes of our legitimate interests in operating the society.

Photos and videos of members 16 and under.	Putting on the Society's website and social media pages and using in press releases	<b>Consent:</b> We will seek the member's parent or guardian consent on their membership application form. Consent may be withdrawn at any time by contacting the society by e-mail or letter.
Voluntary medical condition information for Youth Leaders on members 16 and under. (e.g. Asthma inhaler is with youth member)	Used to aid the youth leader to understand if there are medical issues and treatment plans that they need to be aware of.	<b>Voluntary:</b> For the purposes of our legitimate interests in operating and promoting the society
The Member's name and e-mail address	For the provision of an electronic newsletter and other informative updates of the society's activities	<b>Consent:</b> We will seek the member's consent on their membership application form. The member may withdraw their consent at any time by contacting the society by e-mail or letter or by selecting the link at the bottom of the email.
Bank account details of the member or other person making payment to the Society	Managing the Member's and their dependants' membership of the Society, the provision of services and events	Performing the society's contract with the Member.
Name, e-mail address and telephone number of each Society Officer and Society committee member	Information published on the Society's website, in the Society's newsletter and other publications, in the Society's marketing materials and made available to Associates in each case as a point of contact at the society	For the purposes of our legitimate interests in operating and promoting the society
<b>Audience</b>		
Name, address, telephone numbers, email, number and type of ticket purchased and for which event	For the provision of supplying tickets and monitoring the popularity of events	Performing the society's contract with the individual. For the purposes of our legitimate interests in operating the society.
Name and email	For the provision of an electronic newsletter and other informative updates of the society's activities	<b>Consent:</b> We will seek the individuals consent at point of sale. The individual may withdraw their consent at any time by opting out on the link at the base of the email or by contacting the society by email or letter.
<b>Temporary Contracts</b>		
Musicians, Directors and Performers sub-contracted temporarily by the society (sub-contractors)	Entering into and managing arrangements with sub-contractors	Entering into and performing contracts with sub-contractors

Suppliers		
Employees and representatives of suppliers to the Society	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers

#### 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU other than where this is necessary as part of an agreement with a data processor e.g. MailChimp stores data on US based servers. Details of our data processor privacy contracts are available in section 5.4.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

#### 5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2, 5.3 and 5.4 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to us (e.g. to act as Musicians or Directors). We do this for the purpose of our legitimate interests in operating the Society and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

5.3 We may also pass your personal data to our Associates for the purposes of carrying out surveys when it is in the legitimate interest of the Society and our Associates to do so. Our Associates may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.

5.4 The society uses the following 'Data Processors' to process specific data on the society's behalf.

Data Processor	Purpose	Link to their policy
TicketSource	For the management of ticket sales.	<a href="#">Terms &amp; Conditions</a>

MailChimp	For the management of electronic newsletters and emails.	<a href="#">Privacy Policy</a>
iZettle	For the management of card and cash sales.	<a href="#">Privacy Policy</a>

## 6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Society and for as long afterwards as it is in the Society's legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

## 7. Your rights

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>  
0303 123 1113.  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Executive Committee [[chairman@lyttonplayers.co.uk](mailto:chairman@lyttonplayers.co.uk)].