

## Phoenix Theatre Privacy Policy

This is a notice to inform you of our policy about all the information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

### **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **1. Information we process because we have a contractual obligation with you**

When you buy a ticket for an event at the theatre a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell you tickets for events
- provide you with further information of future events

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

**TicketSource** is our ticketing provider and acts as our Data Processor under the GDPR regulations and is fully compliant with its requirements and those of the Payment Card Industry Data Security Standards (PCIDSS). [View the TicketSource privacy statement](#) .

## **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you with more information about us or the events, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example,

- by asking you to check a box if you want to hear about future events when you buy tickets through **TicketSource**.
- by asking you to sign a form to request to be put on the mailing list for the Phoenix Theatre email newsletter.
- by asking you to agree to our use of cookies when you use our website.

Sometimes you might give your consent implicitly, such as when you send us a message by email to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at email address [info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk). However, if you do so, you may not be able to use our website or our services further.

## **3. Information we process for the purposes of legitimate interests**

We may process information on the basis that there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our organisation
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- protecting your interests where we believe we have a duty to do so.

#### **4. Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

#### **5. Information provided on the understanding that it will be shared with a third party**

Our website displays information that may have been previously posted on our **Facebook** page with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message on our **Facebook** page
- tagging an image on our **Facebook** page
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks on our **Facebook** page

In posting personal information on **Facebook**, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at e-mail address [info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk).

#### **6. Information relating to your method of payment**

Payment information is never taken by us or transferred to us either through our website or otherwise. At the point of buying tickets, you are transferred to a secure page on the website of **TicketSource**, our ticketing provider. That page may be branded in such a way that it looks like a page on our website, but it is not controlled by us as far as processing payments is concerned.

**TicketSource** is compliant with GDPR and those of the Payment Card Industry Data Security Standards (PCIDSS). [View it's privacy statement](#) .

#### **7. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are set by software that operates on our server, and by software operated by third parties, such as Facebook, whose services we use.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to record your answers to surveys and questionnaires on our site while you complete them

## **8. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

## **9. Data may be processed outside the European Union**

Our website is hosted in the UK.

We use **MailChimp**, whose servers are located in the United States of America, to notify you of publication of the Phoenix Theatre newsletter if you asked to be on our Mailing List. Our distribution lists are stored on its secure servers. MailChimp's practices and policies are compliant with GDPR and it does not, under any circumstances, sell our distribution lists. [View its privacy statement](#) .

If you change your mind about receiving the Phoenix Theatre newsletter, at the foot of every email there is an option to unsubscribe from further emails.

## **10. Access to your personal information**

To obtain a copy of any of your personally identifiable information that we hold, send us a request to [info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk).

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

Personally identifiable information given during the ticket booking process and held by **TicketSource** on our behalf as our Data Processors can only be accessed by us, so you will need to send a request by email to [info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk) to get a copy. This does not include any debit or credit card payment information, which we do not have access to.

## **11. Removal of your information**

If you want to remove your personal data from our records you may contact us at [info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk).

We will remove the data as far as it is practically within our power, and where we are not legally obliged to retain it.

To be unsubscribed from our **MailChimp** e-mail Mailing List you should use the 'unsubscribe' link on the emails themselves.

This may limit the service we can provide to you.

## **12. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information, we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **13. Use of site by children**

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian.

## **14. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## **15. How you can complain**

If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is [info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk).

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

## **16. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

## **17. Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we would like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **18. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at:

[info@phoenix-theatre.org.uk](mailto:info@phoenix-theatre.org.uk)

The Phoenix Theatre

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We are a registered charity, our registration number is: 508668.