

Rainham Theatrical Society Ltd - GDPR Privacy Policy

GDPR is short for the EU General Data Protection Regulations 2018. These are the rules that relate to how we collect and process personal data.

1. Who are we?

We are the Rainham Theatrical Society Ltd (RaTS). We own and operate the property known as the Oasthouse Theatre, Rainham. RaTS is a not-for-profit limited company which is operated and managed by volunteers through an elected Executive Committee supported by our members. Our objectives are to:

- run a vibrant, inclusive and successful community theatre in Rainham, Kent;
- inspire people of all ages to connect with theatre by getting involved with the RaTS;
- keep people safe while at the Oasthouse Theatre;
- protect members personal data;
- take action to care for and improve our Grade 2 listed building.

Our postal address is:

Oasthouse Theatre, Stratford Lane, Rainham, Gillingham, Kent ME8 8AG.

Any references to 'RaTS' 'we' 'us' or 'the society/ies' in this document refer to the Rainham Theatrical Society Ltd.

RaTS was established for not-for-profit making purposes. Any surplus funds are re-invested into maintaining and improving our assets. As a not-for-profit organisation we only:

- process information necessary to establish or maintain membership or support;
- process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
- hold information about individuals whose data we need to process to operate our organisation and the personal data we process is restricted to personal information that is necessary to operate our organisation.

2. Our commitment to your privacy

We are committed to keeping the personal details of our members safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information. We update this policy periodically.

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights (www.ico.org.uk):

- **'Data subject'**: this is you, one of our members or supporters. As the data subject, we respect your right to control your data.
- **'Data controller'**: this is us, the Rainham Theatrical Society Ltd. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be a mailing house such as *MailChimp*, who may email our newsletter to you on our behalf. The third parties we work with at no point 'own' your data, so you will never hear from them independently.

We will never sell your personal data.

3. Why do we collect your personal data?

We use your personal data to keep in touch with you.

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The ICO refers to this as a 'lawful basis'. Further information about why we collect your personal data is outlined below.

We collect your data for the following purposes:

a) To administer your RaTS membership

We collect your personal data to administer your membership, which may involve:

- sending you your membership welcome letter and/or pack when you first join us;
- getting in touch should there ever be any issues processing your subscription payment;
- sending you a reminder when we haven't received your subscription.

The ICO define the lawful basis for processing your data for these purposes as **contractual**.

b) To send you information about What's On and news

We also collect your personal data so that we can send you information either by email or post about our events and news. In most cases, the information we send you will be in the form of a newsletter. The information we send you will generally contain content about:

- our productions and other shows at the Oasthouse Theatre;
- social events including theatre trips;
- requests for help;
- theatre news, and anything else that's going on at the Oasthouse Theatre;
- occasionally, we may also use your personal data to ask for your opinion about how the RaTS operates.

This information is in addition to that outlined in section a) above and is defined as *direct marketing* by the ICO.

As defined by the ICO, we use two different lawful bases for processing your data for *direct marketing* purposes, these are *Legitimate interest* and *Opt-in consent*:

Legitimate interest - This is where we have identified a genuine and legitimate reason for contacting you, which crucially does not override your rights or interests. We use **legitimate interest** to send you the information listed above by post.

Opt-in consent - This is where you have given us express permission to contact you by particular communication channels. We use **opt-in consent** to send you the information listed above by email.

We respect your right to update the way we get in touch with you about our work at any time.

c) To enable you to volunteer with us

The RaTS manage and operate the Oasthouse Theatre solely by volunteers and does not employ any staff.

It takes a large number of talented volunteers to run our theatre successfully. Volunteers participate in and/or take responsibility for a wide range of activities, including:

Management:

- Managing the running of our Theatre including being a Director or Member of the Executive Committee or being a member of a Sub-Committee/operational team or taking responsibility for a specific activity;
- Financial Management, including budgetary control and reimbursement of member expenses;
- Managing our membership and publicity processes;
- Facilities Management, including managing our assets, health and safety, fire risk management and maintaining our Grade 2 listed building.

Putting on a show:

- Performing in our productions;
- Back stage, including stage management, prompt and props;
- Setting up and running stage lighting, sound and video projection;
- Set building, including work-ins and scenery painting;
- Making and finding costumes and stage props;
- Production publicity;
- Staffing Front of House during productions including Duty Manager, programme sales, bar and tea bar duties.

Operational:

- Running our licenced bar and tea bar, including purchasing and stock control;
- Bar Duties on non-show nights;
- Maintaining and improving our grade 2 listed building
- Maintaining and improving our stage lighting, sound and video projection equipment;
- Maintaining, adapting and constructing stage scenery;
- Maintaining, updating and improving our website and social media sites;
- Running our wardrobe, costume hire and props store;
- Participating in work-ins around the theatre;
- Organising theatre trips and social events.

All our volunteers are members of the society. Members personal data is collected and managed as part of the membership process including capturing volunteering preferences.

We collect your personal data so that we can keep in touch with you about any activities that you may be interested in. Your personal data also helps us to get to know you better and to develop a 'profile' of you on our secure member database. This 'profile' enables us to contact you in a relevant way to encourage you to activity participate with activities where appropriate.

Setting up member volunteer profiles is work in progress. If on occasion you receive an email from us which contains information that doesn't match the activities you would like to take part in, please advise us by replying to the email and we will amend our records accordingly.

The lawful basis for processing your data for volunteering purposes is:

- **contractual** where we are administering your volunteer profile record; and
- **legitimate interest** when contacting you with information about RaTS activities.

4. What kind of personal data do we collect? How do we collect it?

a) Basic information

We will usually collect basic information about you, including your name, postal address, telephone number and email address.

We collect this data from you directly in writing by you completing either:

- Application for Single or Joint Adult Membership Form.
- Membership Renewal/Change of Personal Details form.
- Ratlets Youth Group Member Information form – This form collects additional personal data (see section d below) and is completed and signed by the Parent or Carer of the child.

Occasionally we may collect supplementary data through an email, in person, over the telephone or in writing.

Only the Treasurer holds personal bank details and only where a member regularly submits expenses claims for reimbursement from the society where payment is by bank transfer. These bank details are kept securely by the Treasurer and the details are blanked out on any paper records. Personal bank details of a member are deleted at the request of a member or when a member no longer undertakes activities that require regular financial reimbursement or when a member terminates their membership of the Society.

b) Getting to know you better

We also collect information about you that helps us to get to know you better. This may include:

- your preference of the activities you would like to get involved with;
- your preference of how you would like us to contact you;
- record of productions you've attended;

Sometimes we will collect other information about you such as date of birth for children who are members of our Ratlets Youth Group (see section d below). When we collect other information, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission.

Our website does not collect your personal data and does not use 'cookies'.

c) Sensitive personal data

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about our members. However, there are some situations where this will occur, in particular with children and young people (see section d below). When we do so, we will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission. In these situations, we collect the data from you directly.

We may also collect sensitive personal data if you unfortunately have an accident whilst at the Oasthouse Theatre –this information will be retained for legal reasons, for safeguarding purposes and to protect us (including in the event of an insurance or legal claim). If this does occur, we will take extra care to ensure your privacy rights are protected including securely storing completed accident records.

d) Children and young people

We will not collect, store or process your personal details if you are under 18 years of age unless we have the express permission from your parent or carer to do so. This consent is obtained in writing from your parent or carer completing our *Ratlets Youth Group Member Information form*. This form requests additional personal data which is listed below. The list also provides our justification for collecting this additional personal data:

- **your date of birth** – to ensure you are an eligible age to be a member of the group;
- **any SEN or medical conditions** – to ensure the organisers of the group have sufficient knowledge about any potential personal issues;
- **the school you are attending** – for our submission to the local authority in connection with the child performance licensing legislation;
- **a second point of contact** - in the event of an emergency and we are unable to contact to first point of contact.

RaTS does not provide online services to children who are members of the Society.

5. How do we store your data?

a) Security

All of the personal data we collect is processed by our members in our membership team.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Members in our membership team receive data protection training and we have a set of data protection procedures which members are required to follow when handling personal data.

b) Payment security

If you use a credit card to make a purchase at the Oasthouse Theatre for show tickets, bar purchases or other purposes we will pass your credit card details securely to our payment provider (Worldpay). Furthermore, none of your personal details are displayed on statements received by our Treasurer from Worldpay.

The RaTS complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

c) CCTV

The use of CCTV in conjunction with our productions is essential to enable the stage manager, the tech crew and cast to monitor the action on the stage.

Only our stage area is monitored by a CCTV camera. The system only has monitors positioned in back stage areas and therefore the public are unable to view images on the system. The system is operational only during performances and technical rehearsals. The system is not used for the purposes of crime prevention.

The system is only monitored in real time. We do not record, store or share any information from the system, and we do not process the information electronically.

d) Data retention policy

We will only use and store information for as long as it is required for the purposes it was collected for. We continually review what information we hold and delete what is no longer required.

We have mapped our membership processes across the lifetime of being a member of the society, including our ex-member data retention policy. After a period of non-payment members personal data will be removed from our membership database.

However, the society would like to keep in touch with ex-members who have significantly contributed to the success of the society. Therefore, the personal details of some long-standing ex-members will be retained on a separate database unless removal is requested.

6. Your rights

We respect your right to control your data. Your rights include:

a) The right to be informed

This privacy policy outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

b) The right of access

If you wish to obtain a record of the personal data we hold about you, through a Subject Access Request, we will respond within one month.

c) The right to rectification

If we have captured information about you that is inaccurate or incomplete, we will update it.

d) The right to erase

You can ask us to remove your personal details from our records.

e) The right to restrict processing

You can ask us to stop using your personal data.

f) The right to data portability

You can ask to obtain your personal data from us for your own purposes.

g) The right to object

You can ask to be excluded from marketing activity.

h) Rights in relation to automated decision making and profiling (making a decision solely by automated means without any human involvement)

We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the [Information Commissioner's Office](#).

7. Making a complaint about how we handle your personal data

We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve.

Our policy is to provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint and to publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.

The principles of our Complaints Procedure are to:

- make sure key members of our organisation know what to do if a complaint is received;
- make sure all complaints are investigated fairly and in a timely way;
- make sure that complaints are, wherever possible, resolved and that relationships are repaired;
- learn from complaints and feedback to help us to improve what we do.

All complaint information will be handled sensitively and confidentially, in line with relevant data protection requirements.

Overall responsibility for this policy and its implementation lies with the Chairman of the Society.

How to make a complaint regarding your data

Complaints regarding the handling of your personal data should where possible be in writing, sent either by letter (**envelope marked - confidential**) or via e-mail. Contact details are below:

Data Queries
Rainham Theatrical Society Ltd
Oasthouse Theatre
Stratford Lane
Rainham, Gillingham, Kent ME8 8AG

Email: dataqueries@oasthousetheatre.co.uk

Note: This email address is only monitored by our member responsible for data protection and the webmaster for our website.

Our member responsible for data protection will aim to respond to you within 14 days of receiving your complaint. If the member responsible for data protection is unable to resolve your complaint, it will be escalated to the Chairman of the Society.

If your complaint is about a non-data protection matter, in the first instance please speak to a member responsible for the activity or a member of the Executive Committee, who will attempt to deal with the matter in an informal way. If this does not resolve the issue to your satisfaction, then you should refer the matter to the Chairman of the Society.

Information Commissioner's Office

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK. Contact details are below:

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

Telephone: 0303 123 1113 Email: casework@ico.org.uk

8. Our website

The RaTS website www.oasthousetheatre.co.uk provides information about RaTS activities. It does not contain third party advertising.

Our website does not use 'cookies' and does not collect your personal data.

We are not responsible for the privacy practices or the content of any other websites linked to our website. If you have followed a link from our website to another website, you may be supplying information to a third party.

9. Get in touch

Should you wish to find out more about the information we hold about you, or about our Privacy Policy, please contact us using the details below:

Data Queries
Rainham Theatrical Society Ltd
Oasthouse Theatre, Stratford Lane,
Rainham, Gillingham, Kent ME8 8AG

Email: dataqueries@oasthousetheatre.co.uk

Note: This email address is only monitored by our member responsible for data protection and the webmaster for our website.

Telephone: 01634 372121 (generally not monitored, publicity information line only)

Website: www.oasthousetheatre.co.uk

10. Our registration status with ICO

RaTS is not registered with the ICO. We are exempt from registration with the ICO because we satisfy all of the following registration exemption criteria:

- we are a not-for-profit organisation;
- our internal CCTV system is not used for crime prevention purposes; and
- our website does not contain third party advertising.

11. Status of this policy

We update this policy periodically. This version of our Privacy Policy was agreed by RaTS Executive Committee on 1 May 2019. Last updated: 1 May 2019

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