

Privacy statement

Purpose of this policy

We are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop a better understanding of our patrons and in turn to provide you with relevant and timely information about the work that we do - both on and off stage. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we collect and use the information we collect from you directly and from other organisations (“third parties”).

We use your information in accordance with all applicable laws concerning the protection and use of personal information. This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to other organisations (third parties)
- Our use of cookies to improve your use of our website
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it

If you have any queries about this policy, please contact our Data Protection Officer.

Who we are

Ayr Gaiety Partnership is a Scottish Charitable Incorporated Organisation (SCIO) registered number SC041464.

Our address and contact details are:

Ayr Gaiety Partnership
The Gaiety Theatre
Carrick Street
Ayr
KA7 1NU
Telephone: 01292 288 235
Website: www.thegaiety.co.uk
Email: info@ayrgaiety.co.uk

Ayr Gaiety Partnership is the organisation that runs:

- The Gaiety Theatre
- Gaiety Act Out



- Back to the Gaiety
- Ayrshire Rural Touring Network

This Privacy Notice applies to all Ayr Gaiety Partnership operations.

AGP is a Data Controller and Data Processor, and its representative as a Controller is:

Jeremy Wyatt, Chief Executive, 01292 288 235

jeremy.wyatt@gaiety.co.uk

The AGP Data Protection Officer is the Operations Manager, Sally Rennie, 01292 288 235.

sally.rennie@ayrgaiety.co.uk

The information we hold

We collect various types of information, in several ways, set out below.

Information you give us

For example when you register on our website, buy tickets or make a donation, we may store personal information you give us such as your name, email address, postal address and telephone number. We will also store a record of your purchases and donations. If we ask for your payment card details, this data goes direct to our merchant service provider (see 'your debit and credit card information' section later).

Information about your interactions with us

For example, when you visit our website, we collect information about how you interact with our content and adverts. When we send you a mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on.

Information from third parties

We occasionally receive information about you from third parties. For example, we may use third party research companies to provide general information about you, compiled using publicly available data.

Sensitive personal data

Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about our patrons unless there is a clear reason for doing so. (As an example, we collect health information about staff and about participants in some of our programme of classes and courses.)

In the case of children and young people attending events, we also record and retain information on attendance and staff involved in line with legal requirements, to be able to respond to future official enquiries, should any incident occur.



Legal basis

The law only allows organisations to hold and process personal data for six reasons, and we use three of these:

1.Contract purposes

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of cancellation of a show, or in the case of problems with your payment.

2.Legitimate business interests

In certain situations we collect and process your personal data for purposes that are in our legitimate organisational interests. However we only do this if there is no overriding disadvantage to you if we use your personal information in this way. We describe below all situations where we may use this basis for processing.

3.With your explicit consent

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation. For example we will ask for your consent before contacting you by email for marketing purposes.

Telephone contact

Although the law allows us to phone you, we will not make phone calls to promote shows, or to seek funding unless you have specifically asked us to do so. We will only contact you by phone (with the exception of volunteers and staff) to let you know about changed arrangements (for example a show cancellation) or to confirm or refine arrangements, for example in the case of a theatre workshop, or to thank you for donations.

How we process data on you that we hold

Marketing

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. In the case of email, we will give you a choice of what (if any) email we should send you during our first purchase with us. If you do agree to receive emails, we will provide you with an option to unsubscribe in every email that we subsequently send you. You can also use the contact details at the end of this policy.



Other processing activities

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.
- We may analyse data we hold about you in order to identify and prevent fraud.
- In order to improve our website we may analyse information about how you use it and the content and ads that you interact with.
- We may use profiling techniques or third party wealth screening and insight companies to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you.

We may also contact you by email about our fundraising activities and opportunities to support us – but only if you have consented to this.

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental rights and freedoms. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

Third parties (other organisations)

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our own service providers who process data on our behalf and on our instructions (for example our ticketing system software provider). In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- To specific named visiting companies whose performances you have attended. In these cases we will always ask for your explicit consent before doing so, when you book your tickets.
- To our in house touring theatre company, Borderline Theatre Company, for planning purposes only.

Cookies

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well as to provide website operators with information on how the site is being used.



We use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we can make.

Your debit and credit card information

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard here:

http://www.theukcardsassociation.org.uk/security/what_is_PCI%20DSS.asp

For ticket purchases made by card over the web, by phone and in person, all your credit card information is passed directly to our payment provider (Worldpay). We do not store this information at AGP premises or in AGP electronic files. We do not write this information down or keep it in any other way. We do not hold it on our ticketing system with your other information – other than the last four digits of your card number so that we can identify the payment if a refund or change is required. We never store your 3 or 4 digit security code. We also track which members of our team were involved in any purchase so we can investigate in the unlikely event of any fraud.

How we look after your information

Maintaining your personal information

We store your personal information so that for any purchases you make, we are able to link them back to a single unique record that we hold for you on our system. Unless you tell us otherwise, we will not contact you again from 5 years after your last active contact with us. At that point we will remove your personal contact data from our system but retain a record so that we can continue to analyse our overall sales over time.

If there are aspects of your record that are inaccurate or that you would like to remove, you can usually do this by logging in to your account through our website. Alternatively please use the contact details at the end of this policy.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

Security of your personal information

We have in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

We will not transfer, process or store your data with any organization that does not comply with GDPR provisions.

Your rights to your personal information

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the start of this policy if you would like to exercise this right.



Withdrawing consent

You have the legal right to withdraw consent for us to hold and/or process your data at any time. This can include withdrawing consent for some activities, but not others (for example, unsubscribing from our email newsletter, but continuing to receive brochures in the post) and you can contact us using any of the following methods:

- Email – please email data@ayrgaiety.co.uk
- Mail – please write to us at Ayr Gaiety Partnership, The Gaiety Theatre, Carrick Street, Ayr, KA7 1NU
- In person at the ticket desk – please ask for a withdrawal of consent form, which our ticket desk volunteers will help you fill in, if required
- By phone – direct to our ticket desk, where our ticket desk volunteers will complete a form on your behalf

Please note that we can't guarantee to act on a change in your consent if you use other methods to communicate with us, such as conversation in passing with a member of staff, emails to other email addresses – although we will always endeavour to comply with your wishes.

Concerns, questions and complaints

If you have any concerns, questions or complaints about our holding or processing of your data in the first place, please contact our Data Protection Officer, Sally Rennie, using email or post – sally.rennie@ayrgaiety.co.uk or Sally Rennie, Operations Manager, The Gaiety Theatre, Carrick Street, Ayr, KA7 1NU. We will aim to answer any query or concern quickly, and normally within a week.

We take all complaints about privacy seriously so each complaint, along with its proposed resolution, will be reported to the AGP board before we issue a response. This may take a little longer, depending on the seriousness of the complaint – but we will acknowledge your complaint and let you know what is happening with it quickly, again normally within a week.

If you are not satisfied with our response, you should make your complaint directly to the ICO:

Through their website - <https://ico.org.uk/concerns/>

Or contacting their live chat <https://ico.org.uk/global/contact-us/live-chat>

Or by calling their helpline on 0303 123 1113.

