

The Witham - Our Privacy Policy

This policy sets out how The Witham Hall Ltd (The Witham) uses and protects any information that you give to us when booking a ticket or when you use our website.

We are committed to protecting your privacy and data. We will use the information that we collect about you in accordance with the General Data Protection Regulation 2018 and the Privacy and Electronic Communications Regulations 2003.

Who We Are

The Witham Hall Ltd is a registered charity and runs The Witham. Our income comes from grants, ticket sales, sale of refreshments, sponsorships and individual donations.

The Charity Registered in England and Wales number 1146726, and a company limited by guarantee registered in England and Wales number 06959661.

We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. Developing a better understanding of our customers and supporters through their personal data helps us programme arts and cultural activities that we hope our customers are going to enjoy.

This privacy policy sets out the ways in which we use your data and how you can hold us accountable for that.

Cookies

Cookies are files which can be stored on your computer when you visit a website. These files contain information about the web pages you look at so that the next time you visit it can be customised to meet your needs.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website to tailor it to customer needs. We use Google Analytics to do this. We only use this information for statistical analysis purposes and then the data is removed from the system.

What information do we collect?

You give us your information when you buy a ticket over the counter, by phone or online via our website, by donating; or by communicating with us. We also keep your details when you sign up to receive emails from us.

When we ask you to provide your personal information, we will let you know why we are asking and how we will use your data, by directing you towards this notice.

The information we hold about you may include:

- Your name
- Postal Address
- Telephone Number
- Email Address
- Ticketing history
- Billing information
- Donation history
- Your preferences for how we communicate with you about our activities
- Preferences and interests
- Information that is available publicly

We maintain a record of your transaction history, but we never store your payment card number.

We keep a record of the emails we send you via MailChimp, and we may track whether you receive or open them, so we can make sure we are sending you the most relevant information. We may then track any subsequent actions online, such as buying a ticket.

Legal Basis

There are three bases under which we may process your data:

- **Contract purposes**

When you make a purchase from us or donate to us, you are entering into a contract with us. To execute 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, we will also send confirmation by email for orders you make online.

- **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 prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing in the Other Processing Activities section.

- **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.

Marketing communications

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 get your consent to receive email marketing communications. We will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.

We may also contact you about our work by telephone however we will always get explicit consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to your purchases (as above).

CCTV

The Witham operates CCTV cameras in public areas of the building. Monitoring screens are in a locked office. Footage is stored on the system for a period of 30 days and then automatically deleted. The CCTV system is “stand-alone” and can only be accessed by the system console onsite. Footage will only be shared with a third party to comply with any legal requirements.

Photography

We occasionally take photographs of performances, audiences and participants for monitoring and marketing purposes.

We ask for explicit consent before taking and using photographs when:

- It is for an activity that participants have specifically enrolled for, such as a holiday workshop or course. We ask for consent as part of the enrolment process
- Where vulnerable children or adults are involved.
- Where school children are involved, with permission being sought via the school.

When we wish to take photographs of audiences, be that watching a performance or mingling in our theatre, we make them aware of the fact by displaying visible notices or by making announcements. If an individual does not wish to be photographed they are encouraged to tell the photographer or a member of staff.

How do we use your data?

If there is any important change to your booking, we will contact you. This information, alongside your purchase/or donation history, is used to select and inform you of other relevant events or activities we think may be of interest to you.

We use your data to:

- Provide you with the event tickets or respond to information you have asked for
- Contact you if there are any important changes to your booking
- Administer your ticket sale or donation, including processing gift aid
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Occasionally we undertake customer research to help us to understand how we can improve our services or information
- To send you promotional, marketing or fundraising information by electronic means if you have consented to this
- To inform you of other products, services or events related to The Witham such as exhibitions, events, volunteering opportunities, or retail offers.
- Analyse your ticketing purchase history to create a profile of your interests and preferences so that we can contact you if you have consented

If you do not want to receive information by email about events, offers, our fundraising activities or customer research, you have the option to change any of your contact preferences by contacting us in person, by email admin@thewitham.org.uk or on the phone 01833 631107.

We use profiling and segmentation based on your past ticket purchases or your preferences given when you sign up to receive our Newsletter. We use this information to ensure communications are relevant and timely, and to provide an improved experience to our customers and supporters.

When building a profile, we may analyse geographic and other information relating to you to better understand your interests and preferences to contact you with the most relevant communications.

Third Party

We will not share any of your personal details with any other third parties without your agreement, unless required to fulfil our contract with you or allowed by law. You will be asked if you consent to the data sharing when booking a ticket.

In general, the third-party organisations are those we use to provide services and will only be to the extent necessary to allow them to perform the services they provide to us. These providers include our Ticketing System provider (Ticket Source) and email distribution service (Mailchimp) and credit card company and payment clearing houses. We have agreements in place with each to ensure that your data is secure and cannot be accessed or used for any other purpose. Some of these third parties may be intermediaries that act solely as links in the distribution chain, and do not store, retain, or use the information given to them.

We may share anonymous ticket information with other organisations, particularly The Audience Agency and The Arts Council. These organisations use this information to analyse tickets sales for national and regional research into Arts attendance in England (for instance, comparison sales trends over time and geographical comparisons). Undertaking this analysis and review the data assists us with reporting to funders and to undertake strategic planning. Your personal data is never sold onto any other agencies or companies.

When booking a ticket, you may be given the choice to also hear from the management or promoter of the show or the artistic company themselves. Under these circumstances and only with your consent we will pass your data to the relevant company and they will be in touch with you to communicate their own Privacy and Data Policy. Should you then wish not to hear from them, please get in touch with them direct.

Links to other websites

Our website contains links to their websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should check the privacy statement of the applicable website.

Giving you control

Unless you ask us not to, we will tell you about shows, concerts, priority booking and opportunities to support us. Occasionally, we may include information in these communications from partner

organisations or organisations who support us. You can opt out from these communications at any time – every email, post or SMS sent to you will tell you how to do this.

If you have opted out of marketing or fundraising communications, we may still get in touch with you regarding your booking, for example we may email you to give you important information about the show you've booked for with any changes that effect you.

Security

We are committed to ensuring that your information is secure. In order, to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Your personal data will be held and processed The Witham in conjunction with our external suppliers of data processing e.g. Ticket Source and Mail Chimp. Where possible we aim to keep a single record for each customer.

Your data is always held securely. Access to customer information is strictly controlled. It is held in the UK and the processes are EU compliant.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

Data Retention

We understand that your personal information and privacy are important to you. We make every effort to ensure that the information you share with us is recorded accurately, retained securely and used only according to your wishes. We protect your personal information and adhere to all current data protection act legislation with respect to protecting privacy. We do not give out, sell or trade our mailing list data with third parties.

The information you provide will be used to primarily to protect your purchases and attendance at events and keep you informed about our activities. The information we share with funders is always anonymous and enables us to demonstrate the impacts of our work the difference that the funding has made.

We will hold personal data on our internal systems indefinitely. We undertake data management reviews on a regular basis. Automatic database cleansing will also take place through Mail Chimp's management of our e-communications system and specifically if you unsubscribe to the Newsletter. Mail Chimp is the electronic system we use for storing and managing personal data of those wishing to receive e-newsletters from us. The ticketing system updates Mail Chimp based on a data subjects consent to receive information and vice-versa if you unsubscribe on receipt of a newsletter.

You can sign up to e-communications (newsletter emails) on our website, by e-mailing us or by completing a postcard/form to keep you in touch with news, events, fundraising activities and current opportunities. You can opt out of receiving information at any time by following the unsubscribe link at the bottom of the email.

If you are booking onto an event over the telephone or in person, we will tell you that your personal data is being held for us to manage the event for which you are buying tickets. We will direct you to

our privacy policy for more information. We will also ask you for consent to receive updates via email regarding our products and services and as appropriate information from a named third party.

When you attend a workshop or activity you may be asked to complete a registration form or be asked for your contact details for a register. Information about opting in will be clearly stated at the top of the registration form and register. By completing the forms and registers, you are giving us permission to hold the personal information given for monitoring and reporting purposes. We may also contact you during the activity for administrative reasons e.g. if there is a change to time or date. We may share this data with the workshop leader but you will be asked to consent to receiving further information from them in the future, if applicable.

Sensitive information

Sometimes we ask you to provide sensitive information, for example if you require access requirements to be in place, or book for certain workshops or when you apply for a job or to be a volunteer. As with all the personal information we hold, sensitive information is held securely and restricted to those who need to use it.

Changes to this policy

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by contacting you directly.

Your rights

You have the following rights related to your personal data:

- The right to request a copy of personal information held about you
- The right to request that inaccuracies be corrected
- The right to request us to stop processing your personal data
- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

Contact Us

If you are unhappy with the way that we have handled your data, do contact us to discuss how we could improve processes. Please contact us if you have any questions about Your Data Protection Promise, or wish to be removed from any communications or data processing activities:

- Email us on admin@thewitham.org.uk
- Write to us at The Witham, 3 Horsemarket, Barnard Castle, DL12 8LY
- Telephone: 01833 631107

If you still have a concern about our information rights practices, you are entitled to contact the Information Commissioner's Office (ICO) on 0303 123 1113 or via their website

<https://ico.org.uk/concerns/>