

PRIVACY NOTICE

Non website-based communication

Pioneer Theatres Ltd own and operate Theatre Royal Stratford East ("TRSE", "We", "our") and is registered with the Information Commissioners Office in respect of our obligations to safeguard your personal data and your privacy.

TRSE is committed to protecting and respecting your privacy and this Notice (together with our terms and conditions) sets out the basis on which any personal data we collect from you, or that you provide to us over the internet, telephone, in person or in writing will be processed by us and the purposes for which it will be processed by us.

TRSE takes reasonable steps to ensure the safety and security of your data and will never sell it onto any other individual or company.

This Notice tells you how and why we collect your personal data and how we treat it.

- For the purposes of the General Data Protection Regulation 2016 and the Data Protection Act 2018 (together referred to in this Privacy Notice as 'the GDPR')¹, the data controller is Pioneer Theatres Ltd, a company limited by guarantee, registered in England and Wales. Registered address Theatre Royal Stratford East, Gerry Raffles Square, London E15 1BN, company number 556251, charity number 233801.
- For the purposes of the GDPR, TRSE's General Manager is the nominated representative.

INFORMATION WE MAY COLLECT FROM YOU

Participants 18+

Parents/Guardians for Participants under the age of 18

- Information that you provide for classes and workshops by filling in forms and emailing to members of staff
- If you contact us by post, email or telephone, we may keep a record
- We may ask you to complete surveys or to take part in research but you are free to decline such requests
- Photographs or film footage of you taken as part of a workshop or event

Teachers

- Information that you provide for any participatory activity that your school children will be taking part in by filling in forms and emailing to members of staff
- If you contact us by post, email or telephone, we may keep a record
- We may ask you to complete surveys or to take part in research but you are free to decline such requests

¹ The Data Protection Act 2018 is anticipated to come into force during 2018

Freelancers

- Information that you provide to us by submitting invoices or contracts of engagement/employment by sending via email or post
- Information you provide us on employment forms which are not contractual, such as next of kin, food allergies and monitoring
- If you contact us by post, email or telephone, we may keep a record
- We may ask you to complete surveys or to take part in research but you are free to decline such requests
- Photographs or film footage taken while fulfilling a contract

Contractors

- Information that you provide to us by submitting invoices and contracts for goods and services via email or post
- If you contact us by post, email or telephone, we may keep a record
- We may ask you to complete surveys or to take part in research but you are free to decline such requests

Job Applicants

- Information you provide to us by submitting application forms for vacant positions at Theatre Royal Stratford East by emailing recruitment@stratfordeast.com
- If you contact us by post, email or telephone, we may keep a record
- We may ask you to complete surveys or to take part in research but you are free to decline such requests

LEGAL BASIS FOR PROCESSING

Our main legal basis for processing personal data is where it is necessary for the purposes of the legitimate interests pursued by TRSE to process your information. We can do that so long as we do not interfere with your fundamental rights or freedoms. Processing includes disclosure of personal information to third parties.

The other reasons we can rely upon to process your personal information under GDPR is as follows:

- With your consent (i.e. agreement) to us processing your personal information. Under the GDPR, consent is a legal basis for processing personal information. You can withdraw your consent at any time. This is explained further below in the section entitled 'Your rights under GDPR'.
- Where we are under a legal obligation or an obligation under a contract to process/disclose the information
- For the purposes of assisting the police and other investigating bodies for the purposes of the prevention or detection of crime and/or investigating fraud

WHERE WE STORE YOUR PERSONAL DATA

- All information you provide to us is stored on our secure servers.
- Any paper copies of your personal information is stored in locked storage units
- Personnel files and training records will be kept up to a maximum of 6 years

- Contracts, agreements and other arrangements including provision of services for a maximum of 6 years
- Application forms and interview notes up to a maximum of 1 year
- Be aware that the internet and the transmission of information through the internet is not fully secure.
- TRSE will use reasonable endeavours to protect your personal data and prevent unauthorised access to it by storing it on a secure server which is password protected and hidden behind a firewall from the outside world, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

USES MADE OF YOUR INFORMATION

We will use information held about you in the following ways:

- to provide you with information, products or services that you request from us or which we feel may interest you,
- to carry out our obligations arising from any contracts entered into between you and us;
- to notify you about changes to our service and your visits to TRSE or if you need any additional information to facilitate your visit;
- to provide aggregate information about our users to stakeholders and funders.

YOUR RIGHTS

You have a number of rights under the GDPR:

Access to personal information

Under the GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request' (SAR). SARs need to be made in writing, and we ask that your written request is accompanied by proof of your identity. We have one calendar month within which to provide you with the information you've asked for (although we will try to provide this to you as promptly as possible).

Following your SAR, we will provide you with a copy of the information we hold that relates to you. This will not generally include information that relates to your property such as repair logs or details of contractor visits, as this is not considered personal information.

Rectification

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting us at dataprotection@stratfordeast.com

Erasure ('right to be forgotten')

You have the right to ask us to delete personal information we hold about you. You can do this where:

- the information is no longer necessary in relation to the purpose for which we originally collected/processed it
- where you withdraw consent
- where you object to the processing and there is no overriding legitimate interest for us continuing the processing
- where we unlawfully processed the information
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- to exercise the right of freedom of expression and information
- to enable functions designed to protect the public to be achieved e.g. government or regulatory functions
- to comply with a legal obligation or for the performance of a public interest task or exercise of official authority;
- for public health purposes in the public interest;
- archiving purposes in the public interest, scientific research historical research or statistical purposes;
- the exercise or defence of legal claims; or
- where we have an overriding legitimate interest for continuing with the processing

Restriction on processing

You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:

- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)
- You challenge whether we have a legitimate interest in using the information
- If the processing is a breach of the GDPR or otherwise unlawful
- If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We must inform you when we decide to remove the restriction giving the reasons why.

Objection to processing

You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.

Withdrawal of consent

You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent, then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interests.

Right to data portability

The right to data portability allows you to obtain and reuse their personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.

CCTV

TRSE manages a CCTV system in and around the building. Only authorised operatives have access to the system. Images are recorded for the purposes of crime prevention and public safety.

RECORDINGS OF VISITORS TO TRSE

We or authorised third parties may carry out film and/or sound recording during, before or after a performance and/or in our venue from time to time. Whilst we take reasonable steps to make sure that visitors are notified of such recording when they enter our venue and are given an opportunity to avoid such recording, by attending our venue you consent to you and any persons (including any children) who may accompany you, being included in such recordings and such recordings subsequently being used by us for any reasonable commercial purposes, including without limitation, for marketing and promotional purposes. We will not make any payment to you in respect of your inclusion in such recordings.

RETENTION OF PERSONAL INFORMATION

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us. We will usually keep records about you for no longer than 6 years

CHANGES TO THIS PRIVACY POLICY

- Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.
- This policy was last updated on 24 July 2019.

CONTACT

- Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to dataprotection@stratfordeast.com
- The Information Commissioner (ICO) is also a source of further information about your data protection rights. The ICO is an independent official body, and one of their primary functions is to administer the provisions of the GDPR. You have the right to complain to the ICO if you think we have breached the GDPR. You can contact the ICO at:

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