PRIVACY NOTICE RICHMOND SHAKESPEARE SOCIETY CHARITABLE INCORPORATED ORGANISATION (RSS)

The Richmond Shakespeare Society Charitable Incorporated Organisation (RSS) is committed to protecting your privacy. This notice explains our core purpose for collecting your personal data from you directly and from third parties, how we use your personal information and how we keep it secure. It explains who we are, what your personal data rights are and how to contact us.

We are the data controller for your personal information, and we will ensure that it is used and stored in accordance with the General Data Protection Regulation (EU) 2016/679 as incorporated into UK law under the Data Protection Act 2018 and amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (**UK GDPR**).

This privacy notice tells you why and how we process your personal information.

- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Richmond Shakespeare Society Charitable Incorporated Organisation, Mary Wallace Theatre, The Embankment, Twickenham, TW1 3DU, GB

chair@rss-mwt.org.uk

What information we collect, use, and why

We collect or use the following information to receive donations or funding and organise fundraising activities:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Tax payer information (for Gift Aid purposes)
- Gifts in wills
- Visitors to our stores and website

We collect or use the following personal information for service updates or marketing purposes:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos

We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Safeguarding information

We collect or use the following personal information for dealing with queries or complaints:

- Names and contact details
- Address
- Account information
- Correspondence
- Criminal offence data

We may also collect or use your special category information for dealing with queries or complaints raised with us. This information is subject to additional protection due to its sensitive nature:

We collect or use the following personal information for administering our membership; keeping members informed of our news and forthcoming events and involving members in aspects of RSS activities that they have advised are of interest to them:

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Photographs or video recordings
- Service use history
- Records of meetings and decisions
- Information about income and financial needs for funding or personal budget support
- Payment details (including card or bank information for transfers and direct debits)
- Donation history
- Records of consent, where appropriate
- Criminal offence data

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.

- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to receive donations or funding and organise fundraising activities are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Our legitimate interest for collecting and using your personal data is to cultivate donor relationships, securing the vital financial support needed to maintain operations and fulfill our charitable purpose.
    - We process personal data (including contact details, incident notes, or relevant background information) when it is necessary for the purposes of our legitimate interests in safeguarding children and adults at risk who participate in, attend, or work/volunteer with our theatre activities. This includes recording and reporting safeguarding concerns, coordinating with statutory agencies (such as local authority social services, police, or the NSPCC), and taking proportionate steps to protect the health, safety, and wellbeing of our company members, youth theatre participants, audiences, and staff. We have balanced these interests against the rights and freedoms of individuals and concluded that this processing is essential, proportionate, and vital to fulfilling our duty of care as a charitable organisation.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for service updates or marketing purposes are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We have a legitimate interest in processing your contact and transaction data to manage your account, fulfill your bookings, and keep you informed about operational updates regarding performances you are attending.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to comply with legal requirements are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We process your personal information (such as your name, contact details, criminal offence data and correspondence history) based on our legitimate interests to receive, investigate, respond to, and resolve feedback or complaints regarding our performances, venue, or operations, and to improve our services and visitor experience.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for Administering our membership; keeping members informed of our news and forthcoming events and involving members in aspects of RSS activities that they have advised are of interest to them are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - Our legitimate interest is to maintain and build a relationship with our audiences and supporters by sharing information about our artistic programme, workshops, fundraising campaigns, and ways to get involved. We also have a legitimate interest in processing any criminal offence data to protect and limit risk to our members and visitors to the theatre.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Charities or voluntary sector organisations
- Third parties:
    - Your contact details have been securely shared with us by Richmond Shakespeare Society. As part of our collaborative initiative to support the performing arts, Richmond Shakespeare Society transferred your information to Richmond Shakespeare Society Charitable Incorporated Organisation (RSS) in accordance with the preferences you previously specified regarding arts and culture communications.
    - Your contact details may at times be securely shared with us by TryBooking in accordance with your booking preferences and in order for us to provide our services to you as a charity.

How long we keep information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, as well as applicable legal requirements.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

TryBooking

This data processor does the following activities for us: Online ticketing, event registration, and payment processing platforms.

MemberMojo

This data processor stores, hosts, and manages personal member data on behalf of RSS.

Intuit MailChimp

This data processor stores and manages personal data (such as subscriber lists, email metrics, and contact names) only according to RSS's instructions to deliver emails and provide analytics

Others we share personal information with

- Organisations we need to share information with for safeguarding reasons
- Relevant regulatory authorities
- Publicly on our website, social media or other marketing and information media

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: chair@rss-mwt.org.uk

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:
ICO Head Office
4th Floor, No.3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint