

PHOENIX THEATRE GROUP DATA PROTECTION POLICY UNDER GDPR

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to data subjects these are more detailed and specific than in the Data Protection Act and place an emphasis on making privacy notices more transparent, and accessible.

Our privacy notice will be supplied to the individual at the time they provide us with their personal data. The GDPR says that the information we provide to people about how we process their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

The Data Controller

Phoenix Theatre Group are the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR).

Contact details of the Data Protection Officer

Phoenix Theatre Group has a Data Protection Officer who can be contacted through dataprotection@phoenixtheatregroup.co.uk

What information do we collect about you?

The GDPR defines **personal data** as the following:

‘Any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;’

Personal data relating to Phoenix Theatre Group members can include: name, date of birth, home address, home telephone number, private email address, emergency contact, etc.

‘**Special categories**’ of personal data (sensitive personal data) relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

Special category data relating to members can include: racial and ethnic origin, religion, health records etc.

Children are identified as **vulnerable individuals** and deserving of specific protection. For the purposes of protection all children under the age of 16 will require adult consent.

How will your information be used?

The purposes for the processing this information.

- administering finance (e.g. membership fees)
- providing parents of younger members with clear understanding of our requirements
- providing members with information (e.g. rehearsals, show dates, show requirements)
- providing operational information

PHOENIX THEATRE GROUP DATA PROTECTION POLICY UNDER GDPR

- promoting our services
- safeguarding and promoting the health and welfare of members
- ensuring members safety and security
- preventing and detecting crime and criminal activities.

What is our legal basis for processing your personal data?

For processing to be lawful under the GDPR, we need to identify a lawful basis before we can process personal data. It is important that we determine our lawful basis for processing personal data and document this.

We will be processing personal data that will satisfy conditions under Article 6 and are processing special category data that will satisfy a condition under Article 6 **and** Article 9.

Article 6 - Personal Data	Article 9 - Special Categories
You must have given consent to the processing *	The member or members parent will have given explicit consent to the processing of data.
Processing is necessary for the register of membership and for the legal obligations of Phoenix Theatre Group (Under The Children & Young Persons Act 1963 and The Children (Performances and Activities) (England) Regulations 2014.	Processing is necessary for the purposes of carrying out the obligations of the controller or of the member in the taking part of any and all live performances . Personal details will be required by the Controller and where in the case of a vulnerable person , will be passed onto the local Council for the purpose of obtaining a performance licence. Parental consent will be required for members under the age of 16
Processing is necessary for compliance with a legal obligation	Processing is necessary to protect the vital interests of the member where the data subject is physically or legally incapable of giving consent. (All members under the age of 16 will require specific consent by a parent or legal guardian).
Processing is necessary for the performance of a task carried out in the public eye	Processing relates to personal data which will be made public by the members. This will include information for any publicity and performance programmes and will include names, ages, photographs .
Processing is necessary for the purposes of the legitimate interests pursued by Phoenix Theatre Group.	Processing is necessary for the activities of the group and for information for the groups public performances. No information will be passed onto 3 rd parties other than for its legal obligations to Local Authorities. Information will be held by the controller for a time not exceeding 12 months (the life of a membership).

*Please note that rules around consent are much stricter under GDPR. Consent means offering individuals genuine choice and control and requires a positive opt-in.

Who receives your information?

The recipients of your data will be limited to Phoenix Theatre Group and Local Authorities (for performance licenses). Your data will also be used for the purpose of Show Literature, Website announcements (cast members) and Show Programs. (e.g. names). Emails will be sent to members for the purpose of information regarding show rehearsals and a Newsletter.

PHOENIX THEATRE GROUP DATA PROTECTION POLICY UNDER GDPR

Photographs will be used for the purpose of the Website and Programs (all photographs will remain the intellectual property of Phoenix Theatre Group and cannot be withdrawn once a program has been printed).

Any transfers to third countries and the safeguards in place

The data will be held in paper form and on an electronic database. These will be secured and limited to a secure server and secure storage until such time that your annual membership has ceased. Under no circumstances will this information be transferred outside of the EU.

How long will your information be held?

Personal information will be stored for a period of no longer than 12months (the life of a membership) exceptions to this will be any photographs or information displayed on our website for previous performances. You will have the right to have these removed at any time.

What are your rights?

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to withdraw your personal information.

Any requests or objections should be made in writing to the Phoenix Theatre Group Data Protection Officer: -

Address:

8 Groves Close
Harvington
Evesham
Worcestershire
WR11 8JG

Email: dataprotection@phoenixtheatregroup.co.uk

Security of your information

The data will be kept secure on a single encrypted server or in paper form in secure storage.

How to make a complaint

If you are unhappy with the way in which your personal data has been processed, you may in the first instance contact the Phoenix Theatre Group Data Protection Officer using the contact details above.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
www.ico.org.uk