

## Halifax Thespians Ltd - Data Privacy Policy

1. This policy relates to all our processing of personal data at Halifax Thespians (hereafter "the company") and its operations at Halifax Playhouse. All involved in this activity must follow this policy and its procedures.
2. As part of the company's General Data Protection Regulation (GDPR) obligations - to minimise the risk of breaches and uphold the protection of personal data - we promote compliance from the early stages of all projects involving data collection, and then throughout their lifecycles.
3. General Data Protection Regulation officer Keith Royston is responsible for ensuring that appropriate Privacy Notices exist and are appropriately published to enable all data subjects to be aware of these notices and their contents before data is collected. All content will be in plain language. The company must ensure that our privacy notice is written in a clear, plain way that a child will understand.
4. The GDPR owner ensures that appropriate technical and operational measures are in place so that, by default, only personal data which are necessary for each specific purpose of the processing are processed. This applies to the amount of personal data collected, the extent of their processing, the period of their storage, and their accessibility. Through these measures, the GDPR owner ensures that, by default, personal data are not made widely accessible without permission.
5. Before any personal data are processed, the specific purpose for this processing will be defined and the legal basis for this definition will be recorded, to include.
  - Protecting the right, freedoms and interests of the data subject
  - The company's authority to carry out the processing that is in the public interest
  - The company's supposition that anyone becoming a member would expect to receive information about the company's activities.
  - Any legitimate interests of the data controller or third party.
  - Obligations under UK law.
6. With regard to special categories of personal data processed, the following may be taken into account:
  - Explicit consent obtained from the data subject to join a mailing list, and/ or to become a member
  - Protecting the right, freedoms and interests of the data subject
  - Data necessary for legitimate activities with appropriate safeguards
  - Personal data made public by the data subject
  - Legal claims
  - Safeguarding - to ensure safeguards are in place for the protection of rights and freedoms of the data subject and all children and vulnerable adults
  - UK laws relating to genetic, biometric or health data

7. Privacy notices are designed to ensure data are processed fairly and lawfully, and are used to emphasise our commitment to transparency over how the company uses personal data.

8. In our Privacy Notices, the controller ensures that, so far as practicable, this information available to the data subjects where data has been acquired directly from them:

- Identity and contact details of the controller and GDPR owner
- Purpose of the processing and the legal basis for the processing
- Categories of personal data
- Any recipient or categories of recipients of the personal data
- Retention period or criteria used to determine the retention period
- The existence of each of data subject's rights
- The right to withdraw consent at any time, where relevant
- The right to lodge a complaint with a supervisory authority
- Requirements for collecting data related to safeguarding

This information is provided at the time the data are obtained. The right to object is made clear at the point of first communication.

In addition, when the data are not acquired directly from the subject, the following information must be included:

- Categories of personal data
- Information on any website technologies used to collect personal data

In this case, information is provided within a reasonable period of having obtained the data (within one month). If the data are used to communicate with the individual, at the latest, when the first communication takes place; or if disclosure to another recipient is envisaged, at the latest, before the data are disclosed.

9. These provisions do not apply where:

- The data subject already has the information
- The provision of the above information proves impossible or would involve an excessive effort
- If obtaining or disclosure of personal data is expressly identified by UK law; or
- If personal data must remain confidential subject to an obligation of professional secrecy regulated by UK law, including a statutory obligation of secrecy.