

WESTWELL PLAYERS PRIVACY NOTICE – MEMBERS AND FRIENDS

Last updated and reviewed by Committee: AUGUST 2023

The Westwell Players Privacy Notice and Policy is committed to protecting and respecting your privacy. The Westwell Players have developed this Privacy Notice in accordance with the requirements of the Data Protection Act 2018 (DPA 2018). The Westwell Players has not appointed a Data Protection Officer to oversee our compliance with the DPA and GDPR as we are not required to do so, but our Data Processor has overall responsibility for our data protection compliance.

Our contact details are in the "Contacting Us" section at the end of this notice. This notice explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others, and your rights in relation to your personal data. This Notice also serves as the Westwell Player's Privacy Policy.

Data protection law says that the personal data we hold on you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that have been explained to you, and not used in any way that is incompatible with those purposes.
- Relevant to the purposes that we've told you about, and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as is necessary for the purposes we have told you about.
- Kept and destroyed securely with appropriate measures to protect your personal data from loss, misuse, unauthorised access and disclosure.

How do we collect information about you?

We obtain information about you in the following circumstances:

- If you provide information through the 'contact us' functionality on our website, <https://www.westwellplayers.co.uk/>. This website uses Google Analytics, please refer to the Privacy Policy here: <https://www.westwellplayers.co.uk/privacy-policy/>
- When you purchase a ticket for our shows via our Box Office, which is hosted by TryBooking. Please refer to TryBooking's Privacy Policy here: <https://www.trybooking.com/uk/info/privacy>
- When you become a 'Friend' OR 'Member' of the Westwell Players.

Where our website contains links to other parties' websites or social media channels, we do not endorse or approve the content or opinions of any third-party site, nor will we have any liability in connection with them. These sites have their own privacy policy, cookie policy and terms and conditions, which may differ from ours.

DATA PRIVACY FOR MEMBERS

If you are a **paid-for** or **lapsed member** ('Member') of The Westwell Players ('we', 'our') this Privacy Policy applies to you.

Member's Responsibilities

- You read and understand this Privacy Policy.
- By providing us with personal data, you confirm that you authorise us to process it on your behalf in accordance with this Privacy Policy.
- If you provide us with personal data about someone else, or we receive personal data about you from another person, we will only use it for the specific reason that it was provided to us

Our responsibilities

As a Member of The Westwell Players, we act as the 'data controller' and 'data processor' of your personal data. This means we decide why we collect your data and how we process it. This Privacy Policy aims to clearly explain:

1. WHEN WE COLLECT YOUR PERSONAL DATA AND THE TYPES WE COLLECT
2. HOW WE USE YOUR PERSONAL DATA
3. WHERE WE STORE YOUR PERSONAL DATA
4. HOW LONG WE HOLD YOUR PERSONAL DATA FOR
5. THIRD PARTIES WHO PROCESS YOUR PERSONAL DATA
6. THIRD PARTIES WE SHARE YOUR PERSONAL DATA WITH
7. YOUR PRIVACY CHOICES AND RIGHTS
8. UPDATES TO THIS PRIVACY POLICY
9. ABOUT THE WESTWELL PLAYERS AND HOW TO CONTACT US

1. WHEN WE COLLECT YOUR PERSONAL DATA AND THE TYPES WE COLLECT

As a Member of The Westwell Players, you interact with us in different ways and we collect data. Sometimes you give the data to us or we collect it about you automatically. Here is how and when we collect data and the type of data we collect:

Data you give to us		
When collected	Type of data collected	Legal basis
Becoming a Member and managing your membership	Contact details: your name, address, email address, phone number, medical conditions or allergies and emergency contact details. Parent/Guardian name, email address and phone number if member is under 18. Collected annually at the AGM. Data that identifies you: date of birth (if under 18)	Legitimate interests
Making a payment to us (bank transfer, standing order)	Contact details: your name, email address Data about you: new membership or renewal	Legitimate interests
Reading for a production	Audition choices: roles/chorus you wish to be considered for	Legitimate interests
Performing in a production	Data about you: your name, measurements/sizing for costumes and accessories, details of any reasonable adjustments required due to allergies or medical conditions.	Legitimate interests
Promoting a production	Data about you: your name, biography (if applicable), photographs for marketing (providing permissions to use have been given)	Legitimate interests
Submitting an expense claim or invoice to us	Contact details: your name, email address Financial information: name of your bank, sort code, account number Expenditure: expenses reference and receipts or invoice, amount	Legitimate interests
Data we collect about you automatically		
When collected	Type of data collected	
Becoming a member	About you: date membership form was completed (annual update), date annual subscription was paid (cash or BACS).	
Making a payment to us (bank transfer, standing order)	About the payment: your name, amount paid, bank received from.	

Performing in a production	<p>About you: Names of character(s) you are playing</p> <p>Sound plot: List of scenes that you appear in and solo vocal numbers</p> <p>Data about you: Notes about your performance in the audition (director, musical director, assistant director, independent observer)</p>
Promoting a production	<p>About you: Names of character(s) you are playing, your physical form/appearance (photo/video) if permissions given.</p>

Sensitive data? We don't collect these categories of 'sensitive data', as defined by the GDPR: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data or data concerning a natural person's sex life or sexual orientation.

If you are performing in a production, we do collect some data concerning your health, so that we are aware of any pre-existing medical conditions, allergies and have your emergency contact details.

Our legal reasons for collecting this data include:

- that you have given your consent by completing the member form.
- that it is necessary for performance of a contract with you, or to take steps to enter into a contract.
- to allow us to carry out our legal and any other statutory obligations

Definitions

Legitimate interests - We process your personal data for our legitimate interests, as long as these do not outweigh your rights and interests. Our legitimate interests are:

- Helping individuals to develop their ability and performance confidence through acting, singing and dance/movement.
- Helping individuals to develop essential life skills such as communication, teamwork and social/networking through a shared interest.
- Staging productions featuring local talent to enrich the cultural experiences offered to Westwell, Kent and the surrounding communities.
- Improving how we manage and operate the Society.
- Ensuring we hold essential information to comply with our Health and Safety and risk assessment requirements.

2 – HOW WE USE YOUR PERSONAL DATA

The GDPR means that we can only use your data for particular reasons and we have a legal basis to do so. Here are the reasons for which we process your data:

When collected	How we use your personal data
Becoming a Member and managing your membership	<p>1 - To administer your membership</p> <p>2 - To send you communications about productions, auditions, news and events (email, phone, social media message)</p> <p>3 - To send you communications via email, telephone, facebook messenger or whatsapp about your membership, casting or updates on the upcoming production.</p> <p>4 - To send you email/phone communications regarding the administration of a production you are in, e.g. rehearsal schedules, costume requirements, marketing etc.</p>

Making a payment to us (all payment types)	<ul style="list-style-type: none"> 1 - To administer your membership, ensure that you have paid the relevant membership and show fees and be covered by our insurance policy 2 - To cross-reference payments you make to the Society by debit/credit card, which are automatically transferred into our bank account 3 - To keep a log of transactions for accounting checks.
Auditioning/reading for a production	<ul style="list-style-type: none"> 1 - To administer your application to audition for a production 2 - To support the decision-making process to select the cast for a production 3 - To administer your membership (if you successfully audition to join the Society)
Performing in a production	<ul style="list-style-type: none"> 1 - To administer the provision and/or hire of costumes/accessories for you from our own costume store or an external supplier 2. To ensure we are able to appropriately respond to emergencies involving you.
Promoting a production	<ul style="list-style-type: none"> 1 - To include your headshot and physical form in rehearsal photos or videos in online and offline marketing campaigns to promote our productions, including but not limited to: website/blogs, social media (Facebook, Instagram, YouTube), direct mailings, email campaigns, local newspapers 2 - To include your headshot, name and rehearsal photos in the show programme 3 - To include your headshot, name and rehearsal photos in front of house displays at the performing venue. 4 - To publish a cast list on our website and in the show programme 5 - To publish your biography in the show programme
Submitting an expense claim or invoice to us	<ul style="list-style-type: none"> 1 - To pay your invoice or authorised expenses via cheque 2 - To keep a log of transactions for accounting checks.
Making a refund	<ul style="list-style-type: none"> 1 - To issue a refund to you

3 – WHERE WE STORE YOUR PERSONAL DATA

We have procedures to secure the data we hold physically and electronically. By submitting your personal data, you agree to the transfer of data to us and the storing or processing by us.

The personal data that you provide is processed by individuals on the Westwell Players Committee, predominantly living in Ashford, Kent who hold a specific role in the operation of the Westwell Players and the staging of a production. These roles consist of formally elected roles on our committee: chairman, vice-chair(s), treasurer, secretary and ordinary committee members and other individuals fulfilling a specific role, for example current Director/Producer. Emergency numbers will be available to committee members during rehearsals.

Remember: You provide personal data at your own risk: unfortunately, no data transmission is 100% secure.

4 – HOW LONG WE HOLD YOUR PERSONAL DATA FOR

We retain your personal data for different lengths of time, depending on how we use it:

When collected	Retention period
Becoming a Member and managing your membership	<p>Paid-for members: Until the end of your membership</p> <p>Lapsed members: The earlier of, you unsubscribing [by informing the committee] or the following AGM one year later. You can request for your record to be deleted at any time - contact the Westwell Players Committee</p> <p>A list of names only of previous members will be maintained for 3 years for insurance purposes.</p>
Making a payment to us (all payment types)	<p>6 years</p> <p>Card payment provider: For the duration that the third party provides the service to</p>

	us. Data is also retained after they cease providing the service to comply with legal and regulatory obligations
Auditioning and performing in a production	6 months
Promoting a production	Indefinitely
Submitting an expense claim or invoice to us	6 years
Making a refund	6 years

In general, we will endeavour to keep data only as long as it is reasonable and necessary to do so. This means we will delete it when it is no longer needed or is not reasonable to retain it.

5 – THIRD PARTIES WHO PROCESS YOUR PERSONAL DATA

Below is a list of third parties who we use to process your personal data, what they collect and the purpose and place of processing.

Service provider	Type of data collected or shared	Purpose	Place of processing
Analytics			
Google Analytics Privacy policy	- How you use our website (anonymous)	To track the use of our website, prepare reports and improve the design/user interface	USA
Box Office			
TryBooking Privacy policy Ticket Source Privacy Policy	- Ticket sales	To administer the ticket sales for performances	UK
Payments			
Lloyds Bank SumUp and Square – card readers.	- Contact details - Financial information - Expenditure - Card reader payments	- To pay your invoice or authorised expenses via cheque - To issue a refund to you - To keep a log of transactions for accounting checks - To take payment for additional goods available during the performances.	UK and EEA UK, USA, EU
Productions			
Costume hire suppliers	- Data about you	To administer the provision and/or hire of costumes/accessories	UK
Social media such as Facebook, Instagram, X, Snapchat, YouTube, Local press, e.g. KentOnline and online review websites	- About you	To promote productions, such as interviews, names of character(s) you are playing, your physical form/appearance in videos and photosWhatsapp group chat	USA, UK

Whatsapp group chat and Facebook messenger groups	Name/Phone number	To provide updates on key production matters and group socials.	
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6 – THIRD PARTIES WE SHARE YOUR PERSONAL DATA WITH

- We do not sell or rent your data on to third parties.
- We will not share you information with third parties for marketing purposes.
- We only share your personal data with third parties for the purposes of processing, as outlined in section 5.
- We will not release your information to third parties unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.
- Allergy or medical information provided may be shared with the emergency services if relevant when responding to an emergency.

7 – YOUR PRIVACY CHOICES AND RIGHTS

Your choices

- **You can choose not to give us your personal data** - If you choose to do this, you will not be able to become a Member, or perform in a production.
- **You can ask us not to use your data for marketing** - Whilst we need to collect and process your name, phone number and email address to administer your membership, you can choose the other types of phone/emails updates you want to receive from us. You can opt-out of updates by informing the Westwell Players Committee or leaving the Group Whatsapp chat.

Your rights

To exercise any of these rights, contact us The Westwell Players Committee.

- **The right to access information we hold about you.** This includes asking us about:
 - the type of data we're processing
 - the legal basis for processing
 - the categories of third parties to whom your data may be disclosed
 - how long we retain data for.

We will provide you with the information within one month of your request.

- **The right to correct any inaccurate personal data about you.**
- **The right to be 'forgotten'** - You can ask us to erase all personal data that we hold about you, if you no longer wish to have any contact or connection with the Society.
- **The right to withdraw consent;** To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- **The right to object to the processing of your personal data,** or to restrict it to certain purposes only; You have the right to ask us to stop processing your personal data or to ask us restrict processing. On receiving such a request, we will contact you and let you know if we are able to comply with your request or if we have a legal obligation to continue to process it.
- **The right to data portability;** You have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- **The right to complain about how we use your personal data** - Please get in touch with us first to discuss concerns you have about your personal data and how we are using it. If you are still not satisfied thereafter,

you have the right to a lodge a complaint with the Information Commissioner's Office. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioners Office (ICO) on 0303 123 1113 or by email at <https://ico.org.uk>. The ICO's address is Wycliffe house, Water Lane, Wilmslow, Cheshire SK9 5AF.

- **Automatic data profiling** - We do not undertake any automatic profiling of your data.

8 – UPDATES TO THIS PRIVACY POLICY

We will update this Privacy Policy from time-to-time to reflect changes in law or how we operate. When we make changes, we will update the 'Effective date' shown at the top of this policy and post an update on our website. Where substantial changes have been made we will notify you directly (for example, at the AGM or by placing a prominent notification on our website).

9 – ABOUT WESTWELL PLAYERS AND HOW TO CONTACT US

The Westwell Players is a self-funded, not-for-profit organisation run by volunteers.

If you have any questions about this Privacy Policy, please discuss this with the Committee:

Email: westwellplayers@gmail.com

Website: via our [general enquiry form](#)