

# Privacy, Data Protection and Cookies Policy

Updated November 2020

## Introduction

Dance Umbrella is committed to protecting our customers, donors, artists and partners privacy and takes its responsibility regarding the security of their personal information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us and through your use of our website and online services;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- How we comply with the data protection rules;
- And notifications of changes to our privacy policy
- All personal data is collected and processed in accordance with UK and EU data protection laws:
  - o The Data Protection Act 2018
  - o The Privacy and Electronic Communications (EC Directive Regulations 2003)
  - o The EU General Data Protection Regulation (Regulation EU 2016/679 - GDPR)

## Data Controller

“Dance Umbrella” (referred to as “we”, “us”, “our” or “DU”) in this policy, refers to Dance Umbrella Limited and is the “data controller” of all personal information that is collected and used about Dance Umbrella customers, donors, artists & partners, for the purposes of GDPR and the Data Protection Act 2018. Dance Umbrella is a national arts organisation and a charity registered in England and Wales, number 277221. It is also a company limited by guarantee registered in England and Wales, number 1402702 (registered offices at 7 Savoy Court, London WC2R 0EX).

## What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, booking reference number, payment details and information about your access to our website.

We may collect personal data from you when you purchase tickets, make a donation, join our mailing list, or form a contractual presenting/commissioning agreement with us as an artist or producing partner.

Specifically, we may collect the following categories of information:

- **Identity Data** includes name, title, date of birth, gender, user name or similar identifier.
- **Contact Data** includes billing address, delivery address, e-mail address, and telephone numbers.

- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about your purchases or donations;
- **Profile Data** includes your username and password, purchases or orders made by you, your interest, preferences, feedback and survey responses.
- **Usage Data** includes information about your use of our website; products and services;
- **Marketing and Communications Data** includes the communications you exchange with us or direct to us via letters, emails, calls, and social media as well as your preferences in receiving marketing from us and our third parties and your communication preferences
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data derived from your personal information but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect **Aggregated Data** with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We will process any such data only if you have given your explicit consent, or it is necessary (for instance if you request special assistance).

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a ticket). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

We understand that people aged under 16 may use this website. To request to see our safeguarding policy, please contact us using the contact details at the end of this policy.

## How we collect your data

We collect different information about you in a number of ways:

### Information you give us

When you create an account on our website, buy tickets, sign up to our newsletter, request marketing materials, give us feedback or make a donation, we will store the personal information you give us (such as your name, email address, postal address, telephone number and card details). We will also keep a record of your purchases and donations.

### Automated technologies and interactions

As you interact with our website, we may automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies.

### The use of cookies and beacons

We use cookies and web beacons (Website Navigation Information) to collect information as you navigate DU's website. This includes standard information from your web browser, such as browser type and browser language; your Internet Protocol (IP) address; and the actions you take on our website, such as the pages viewed and the links clicked.

This information is used to make websites work more efficiently, as well as to provide business and marketing information to the website owner, and to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purposes of understanding how visitors use a website. Cookies and other such technologies help us tailor our website to your personal needs, as well as detect and prevent security threats and abuse. If used alone, cookies and web beacons do not personally identify you.

For further information visit <http://www.aboutcookies.org> or <http://www.allaboutcookies.org>. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

#### Information from third parties

We occasionally receive information about you from third parties as set out below:

- Analytics providers such as Google
- Advertising networks such as Facebook
- Search information providers such as Google AdWords

#### How we may use your information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract, we are about to enter into or have entered into with you.
2. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
3. Where we need to comply with a legal or regulatory obligation
4. Where we have your explicit consent before using your personal information. Please note that we do not generally rely on consent as a legal basis for processing your personal information and you have the right to withdraw consent to marketing at any time by contacting us. You will find the relevant contact details at the end of this policy,

#### Purposes for which we will use your personal information

The below table identifies all of the ways we may use your personal information, which of the legal basis we rely on to do so, and what our legitimate interests are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Data	Lawful basis for processing (including legitimate interest)
To register you as a new customer	Identity Contact	Performance of a contract with you

<p>To process and deliver your ticket booking, including:</p> <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	<p><b>Identity</b> <b>Contact</b> <b>Financial</b> <b>Transaction</b> <b>Marketing &amp; Communications</b></p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you, which includes:</p> <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy</li> <li>• Asking you to leave feedback or participate in a survey</li> <li>• To contact you if you have entered a competition via DU</li> </ul>	<p><b>Identity</b> <b>Contact</b> <b>Profile</b> <b>Marketing &amp; Communications</b></p>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep updated records and to analyse how customers use our products/services)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p><b>Identity</b> <b>Contact</b> <b>Technical</b></p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements and measure/understand the effectiveness of the advertising we serve to you</p>	<p><b>Identity</b> <b>Contact</b> <b>Profile</b> <b>Usage</b> <b>Technical</b> <b>Marketing &amp; Communications</b></p>	<p>Necessary for our legitimate interests (to analyse how customers use our products/services, to develop them, to grow our business and to inform our marketing and communications strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing and communications, customer relationships and experiences</p>	<p><b>Usage</b> <b>Technical</b></p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated, to develop our business and to inform our marketing and communications strategy)</p>

To make suggestions and recommendations about goods or services that may be of interest to you	<b>Identity</b> <b>Contact</b> <b>Profile</b> <b>Usage</b> <b>Technical</b>	Necessary for our legitimate interests (to develop our products/services and grow our business)
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### Marketing communications

We aim to communicate with you about the work that we do and provide tailored and relevant information. We use your data, such as which events you have booked for in the past and in accordance with the contact preferences you may have told us about, to provide information we believe is of interest to you, prior to, during, and after your attendance to a Dance Umbrella event to personalise the services we offer to you, such as special ticket offers;

We use our legitimate organisation interest as the legal basis for communications by post and email. In the case of postal mailings, you may opt out of receiving these at any time using the contact details at the end of this policy or by updating your contact preferences in your online account with us.

In the case of email, you will have an option to unsubscribe in every email communication that we send. As part of our service to you, we may contact you by email or telephone to provide essential information related to your purchase and visit.

### Fundraising Communications

Dance Umbrella is a registered charity and under our legitimate organisational interest, we may contact you by post or email to seek your support for our charitable activities. You are able to opt out of receiving any such communications from us at any time by using the contact details at the end of this policy.

Additionally, and only if you have given your consent, we may contact you by email or post to seek your financial support.

You have the right to object to any of this processing at any time by using the contact details at the end of this policy.

### Disclosure of personal data to third parties

- There are certain circumstances under which we may disclose your personal information to third parties. For example, to our service providers who process data on our behalf and on our instructions. These include Mailchimp, the platform we use for managing our mailing list subscriptions and Stripe, the payment processing system we use for ticket bookings and donations. We require all third parties to respect the privacy of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

- Credit and debit card companies which facilitate your payments to us, and anti-fraud screening, which may need information about your method of payment and booking to process payment or ensure the security of your payment transaction.
- Legal and other professional advisers in order to enforce our legal rights in relation to our contract with you.
- Our trusted third-party partners (venue and other presenting partners) if you have specifically given us permission to do so by opting in to sharing your personal data at the time of your booking. We are not responsible for third parties' use of your personal data where such use is permitted for their own purposes. Please consult their privacy policies for further information.

We may share anonymised personal information with other organisations, particularly Arts Council England and the Audience Agency, who use this to analyse audience development initiatives and ticket sales to understand the impact of the public investment made in DU.

We do not sell personal details to third parties and will always ask for your consent to pass on personal details to other arts organisations in line with Arts Council England's data sharing requirements.

We use Mailchimp as our marketing platform. By subscribing to our newsletter mailing list and registering for selected events, you acknowledge that your information will be transferred to Mailchimp for processing. Learn more about Mailchimp's privacy practices here. <https://mailchimp.com/legal/>

## Security of your personal information

We have put in place appropriate safeguards (both in terms of the procedures and technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same and that they will only process your personal information on our instructions and will be subject to a duty of confidentiality.

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). We use Stripe and WooCommerce for processing payments and bookings. Learn more about their data storage and privacy practices here: WooCommerce - <https://automattic.com/privacy/>  
Stripe - <https://stripe.com/en-gb/privacy>; [https://stripe.com/gb/ssa#section\\_d](https://stripe.com/gb/ssa#section_d)  
We do not store your credit or debit card data on our computer networks, this is processed by our third-party partner, Stripe.

## Data Retention

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 our personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When our use of your personal data is based on your consent, you have the option to withdraw your consent to our processing and delete your personal data at any time by **Unsubscribing** or by sending an email to the contact listed at the end of this policy.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

### **Data protection officer**

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this policy. In addition, you always have the right to make a complaint at any time to a supervisory authority. The ICO (Information Commissioner’s Office) is the lead data protection supervisory authority for Dance Umbrella as a UK data controller.

### **Your data protection rights**

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. You can make corrections to your personal data through our dedicated web-form email. Dance Umbrella’s [terms & conditions](#) apply in relation to the correction of any errors on your existing bookings.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). You can delete that personal data where our use of this data is based on your consent by Unsubscribing.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. You can object to our processing of your data for direct marketing purposes by unsubscribing from our mailing (see section ‘What do we use your personal data for, why and for how long’ for more details).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

### **Withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have

received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you want to exercise any of these rights please email the contact listed at the end of this policy You will not have to pay a fee to access your personal information or to exercise any of the other rights. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Changes to privacy policy**

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.

### **Contact details and further information**

Please get in contact with us if you have any questions about this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us:

Email: [admin@danceumbrella.co.uk](mailto:admin@danceumbrella.co.uk)

Post: Data Protection Officer at Dance Umbrella, Somerset House, West Wing, Strand, London WC2R 1LA