

## **Privacy Notice**

Author/ Checked :	CBowdler / CFL
Date	May 2021
Approved by	
Issue Date	24 May 2021
Next Review Date	May 2022

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## **1. Introduction**

National Youth Ballet is a registered charity no. 1000932. We have created this statement to demonstrate our firm commitment to respecting your privacy and safeguarding your data. We collect data in order to provide you with the most efficient and personalised service possible. We do not collect personally identifying information about you unless you choose to provide such information to us.

The personal information we collect, process or use is treated securely and in accordance with the Data Protection Act 1998, the Privacy and Electronic Communications Regulations 2003 and the General Data Protection Regulation 2018.

Whenever you give us personal information you are consenting to its collection and use in accordance with this policy.

## **2. The legal bases**

The law on data protection sets out six lawful bases for which an organisation may collect and process your personal data. The most relevant lawful bases for National Youth Ballet are:

### **2.1 Consent**

#### **2.1.1 Active consent**

When you actively give us permission to contact you about certain activities, such as our marketing or fundraising activities.

*For example, when you tick a box to receive email newsletters.*

#### **2.1.2 Implied Consent**

When it is reasonable from the context to conclude that the person consents to receiving direct marketing. National Youth Ballet uses implied consent as a lawful basis to contact potential participants or donors with relevant marketing and fundraising communications. We will only communicate with people on this basis if they have not objected to receiving such communication.

### **2.3 Contract**

In certain circumstances, we need your personal data to comply with our contractual obligations to you.

### **2.4 Legitimate interest**

When we process your data in a way which you would reasonably expect us to do when you provided it and which does not materially impact your rights, freedom or interests.

*Please note: whichever legal bases is used to process your data, you can alter your preferences or opt-out from receiving communication from us at any time (see sections 7.0 and 8.0 for further information)*

## **3.0 What personal information we collect and process**

When you sign up for our e-newsletters, mailing list or otherwise provide us with your information we will retain your name, contact details and contact preferences. If you have agreed to your information being shared with National Youth Ballet when purchasing a ticket for

any of our activities we will also record details of the activity you attended.

When you make a donation we will record details of when you made your donation, details of the donation and your Gift Aid status. We may also ask you to provide details about your current interests and activities, and information regarding your spouse/partner where appropriate.

When you use our website we log your Internet Protocol (IP) address, in order to receive and send information from and to you over the internet. Our website also uses cookies to enable online transactions, understand how people use our website and inform our digital advertising.

#### **4.0 What information we collect about you from other sources**

We may combine the information above which you provide to us with the information we collect about you from external sources in order to gain a better understanding of our audiences, and supporters and to improve our fundraising methods, and other products and services. The personal information we collect from you or external sources may (depending on the purpose for which you initially provide us with your information) include:

- ticket purchases (but not payment methods/details) and event attendance
- details of correspondence we send to you, or we receive from you
- employment and professional information and activities information relating to charitable interests and activities, as well as inclination and - capacity to support National Youth Ballet.

#### **5.0 Sensitive Information**

Some of the information which we collect from you (for example where you apply to take part in one of our projects) may constitute sensitive personal data. We will only ever use this in accordance with this policy and shall maintain necessary measures to protect this information and its confidentiality.

#### **6.0 Uses of your information**

Depending on the preferences you have indicated and your relationship with National Youth Ballet, we will use the personal information you have provided to:

- provide goods and services to you or process donations that you make to us
- send you communications by post or electronic means in order to inform you of other products, services or events related to National Youth Ballet, which may include emails containing relevant news or information from other arts organisations
- ask you to participate in surveys and market research
- conduct fundraising activities and ensure our fundraising resources are used in the most effective and efficient manner and that any communications we may send are appropriate and of interest to you
- improve our understanding of our audience through basic profiling, tracking of your activity on our site and your response to emails (or other communications) that we send you

- notify you of changes and improvements to events, services, website and this privacy policy.

## **7.0 Preferences and Opt-out**

### **7.1 Preferences**

You can choose how National Youth Ballet communicates with you, and what communications you receive, these are called preferences. Our forms have clear marketing and fundraising preference questions, allowing you to opt-in to receive both marketing and fundraising communications, one or the other, or neither. You can change your preferences at any time by contacting [info@nationalyouthballet.org](mailto:info@nationalyouthballet.org)

### **7.2 Opt-Out**

You can opt-out of receiving communication from us at any time by: - Selecting 'email preferences' at the bottom of email communications - By contacting [info@nationalyouthballet.org](mailto:info@nationalyouthballet.org)

## **8.0 Sharing your personal information**

Your personal information might be passed to a third party if they need it to fulfil your order(s) for our goods and services, to execute the communications we send to you or to process a donation. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal information they have collected or have access to.

*Examples of these third parties include our bank (in order to process Direct Debit and other payments), mailing houses (for distributing our marketing materials), our bulk email distribution service provider, and audience analyses and data cleansing suppliers, for example to access the Post Office National Change of Address (NCOA) database.*

Except as set out in this policy, we shall not disclose your personal information unless obliged to, or allowed to do so by law, or where we need to in order to run our business (e.g. where other people process information for us). In such circumstances, we ask those people to give us confidentiality or non-disclosure undertakings.

We will not share your information other than as described above without your express consent.

## **9.0 How we keep your personal information safe**

We ensure that there are appropriate technical controls in place to protect your personal details. The personal information that you provide will be held securely and will not be used for any other purpose than as provided for in this policy. We ensure that there are appropriate technical controls in place to protect your personal information; for example, any information

which we transfer is encrypted and password protected, and all of our staff receive data protection and security training.

While we strive to keep your information as safe as we can, the transmission of information via the internet can never be completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **10.0 How we keep your information up to date**

We endeavour to keep your personal information accurate and up to date. If you become aware of errors or inaccuracies, please email [info@nationalyouthballet.org](mailto:info@nationalyouthballet.org)

Where possible we use publicly available sources to keep your records up to date. *For example, the Post Office National Change of Address (NCOA) database and information provided to us by other organisations as described in this policy.* We would really appreciate it if you could let us know if your contact details change.

## **11.0 Your rights over your personal data**

You have the right to request:

1. Access to the personal data we hold about you, free of charge
2. The correction of your personal data when incorrect, out of date or incomplete.
3. That we stop using your personal data for marketing and/or fundraising (either through specific channels, or all channels).
4. That we stop any processing of your personal data after you withdraw that consent.

You can contact us to exercise these rights at any time as follows:

- To ask for your information please contact our Data Protection Officer, Claire Bowdler by emailing [info@nationalyouthballet.org](mailto:info@nationalyouthballet.org)
- To ask for your information to be amended please contact [info@nationalyouthballet.org](mailto:info@nationalyouthballet.org). If we choose not to action your request we will explain to you the reasons for our refusal.

### **11.1 Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **11.2 Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **11.3 Marketing & Fundraising messages**

You have the right to stop the use of your personal data for direct marketing and/or fundraising activity through all channels, or selected channels. We must always comply with your request.

### **11.4 Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission

to act.

## **12.0 Changes to this policy**

Our privacy policy may change at any time, so you may wish to check it each time you visit our website. Any changes will apply from the time that they are posted to this page. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by contacting you directly.

If you have any questions at all about the ways in which we collect and use your personal information please contact us at [info@nationalyouthballet.org](mailto:info@nationalyouthballet.org) at any time.

## **13.0 Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling **0303 123 1113** or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.