



# Harlequin Eastwood Theatre for Youth Privacy Policy

We are committed to ensuring your privacy is protected and our collection and use of your personal information is governed by this privacy policy.

The policy explains:

**Who are we?**

**What is personal information?**

**Our obligations**

**How we keep your personal information secure**

**What personal information do we collect, store and use?**

**How do we collect the above information?**

**Legal Basis for the collection, use and storage of your personal Information**

**Who do we share your information with?**

**How long do we retain this information?**

**Do you transfer my information outside of the EEA?**

**Changes in personal information**

**What are your rights?**

**Who do I contact to exercise my rights or request a transfer of information?**

**What if I wish to withdraw my consent?**

**How do I opt out of receiving information?**

**Changes to or queries about the Privacy Policy**

**How do I make a complaint?**

**Who are we?**

Harlequin Eastwood Theatre for Youth “Harlequin” is one of the leading amateur youth theatre companies in Scotland. Harlequin was set up in 1977 and has for the last 40 years provided opportunities for young people to be involved in the theatre within the East Renfrewshire area. The club performs three shows every year in Eastwood Park Theatre.

**What is personal information?**

Personal Information is any information that identifies you. This could be your name, address, e-mail address, date of birth or even information about your needs or circumstances.

There is a “special” category of personal information, which may be described as particularly sensitive. This includes information about your sexual orientation, health, political leanings or views, religious beliefs and ethnic or racial origin.

As a result of its sensitivity, it requires further protection and we have to have further justification for collecting, storing and using it.

## Our obligations

As a club, we must and we guarantee that we will comply with data protection legislation.

This means that your personal information must be:-

- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Used lawfully, fairly and in a transparent way;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

## How we keep your personal information secure

The security of your information is very important to us and we have measures in place to prevent unauthorised access to it.

- Our membership data is held on a password protected laptop. Only those who are required to access your information for legitimate purposes have access;
- Our marketing data is kept securely and has restricted access;
- Our committee members are trained in all aspects of data protection legislation.

## What personal information do we collect, store and use?

**SALES AND MARKETING:** If you buy tickets from us for a show on behalf of yourself or a group, we will need to collect and use your personal information in order to allow us to fulfil the order.

We collect and use

- Your name and title;
- Your home address;
- Your personal telephone numbers;
- Your personal email address and
- The name of the Club Member to whom you wish to attribute the sale (if appropriate).

If you give us specific consent we will keep your name and e-mail address on file but only for the purpose of highlighting other Harlequin shows to you.

**SUPPLIER INFORMATION:** We need a small amount of information from our Suppliers to ensure that we can pay our bills. We also need contact details of relevant individuals at your organisation so that we can communicate with you. We will collect, use and store:-

- Your name and title;
- Your office address;
- Your telephone numbers;

- Your email address;
- Name, job title and contact details of those within your organisation we might have contact with;
- Details of your bank account and
- Any reports or invoices you issue.

**PROSPECTIVE MEMBER INFORMATION:** From time to time we hold auditions for new members. We will ask you to provide the following information which we will use solely for the purpose of auditioning your child for membership:-

- Your name;
- Your child's name and date of birth
- Your home address;
- Your telephone numbers;
- Your email address;
- Details of your child's previous experience.

**FORMER MEMBER INFORMATION:** If you have been, but are no longer a member of Harlequin, we will collect use and store a limited amount of information for historical purposes and to furnish information for our website and our anniversary publications. We will collect, use and store:

- Your name
- Your dates of club membership:
- Your club history (shows performed, show jobs)

For more recent members we will also continue to store

- Your address;
- Your personal telephone numbers;
- Your e-mail address;

**CURRENT MEMBER INFORMATION:** If you are a current club member, we will collect use and store information to allow us to contact you, to record your history with the club for our website and our anniversary publications and to ensure your health and safety through having emergency contacts and GP details. The information we will collect, use and store is:

- Your name;
- Your address;
- Your personal telephone numbers;  
(and all of the above for your emergency contacts)
- Your e-mail address;
- Your date of birth;
- Your gender;
- Your subscription and annual membership update confirmation;
- Whether or not you have a Harlequin PVG certificate in place;
- Your GP name and contact details
- Details of any medical or other issues such as allergies which we may need to know in an emergency or may require reasonable adjustments to allow you to perform \*
- Your club history (shows performed, show jobs)

\*This information may constitute special category data. We will only ever pass special category data to medical professionals in order to provide you with effective treatment.

We may also ask members or their parents to consider applying for enhanced security checks ie. PVG (Protection of Vulnerable Group) checks. We will only use the data provided for these applications for the purpose for which they were intended.

**WEBSITE USERS:** For those who use our website: we collect a limited amount of personal information. If you would like to find out more information about what information we collect about you when you visit our website, please see our Cookies Policy.

### [How do we collect the above information?](#)

**SALES AND MARKETING:** We collect your personal information when you apply for tickets for a show either using the ticket order form or through our website.

**SUPPLIER INFORMATION:** We collect your personal information directly from you.

**PROSPECTIVE MEMBER INFORMATION:** We get this information from the application form you provide.

**FORMER MEMBER INFORMATION:** We get this information from your membership form when you were last a member and create your show history as you perform/work on a show.

**CURRENT MEMBER INFORMATION:** We get this information from your membership form, updated each year, and create your show history as you perform/work on a show.

**WEBSITE USERS:** We collect your information automatically via cookies when you visit our website, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, we have a cookies policy on our website.

### [Legal Basis for the collection, use and storage of your personal Information](#)

Save in very limited circumstances set out elsewhere in this policy, we will not share your personal information and we will only collect, use and store it where there are lawful reasons to do so. Most commonly, we will process your personal information in the following circumstances:

- Where there is a legitimate interest to do so
- Where it is necessary to implement the contractual arrangements between us
- Where we are legally required to do so; or
- Where you have given us express consent.

## Legitimate Interest

In order to establish that our collection, storage or use of your personal information is in either our, your or both of our legitimate interests, we will have established the following:

- There is, in fact, a legitimate interest; whether it be commercial or individual;
- Our use of your information is necessary to achieve that legitimate interest; and
- Our use is balanced against your rights, interests and freedoms.

## Contractual Arrangements

This is a lawful basis for collecting, using and storing your personal information if

- It is required to implement or fulfil a contract between us; or
- You have asked us to do something before entering into a contract (e.g. provide a quote)

## Legal Basis

We reserve the right to disclose any information you provide to us where required to do so by law, or to comply with a regulatory obligation, or to assist in any investigation into a complaint or welfare issues, or alleged illegal or criminal conduct.

## Who do we share your information with?

Personal Information as described in this privacy policy will never be sold or shared to any third party outwith our business, save in the following circumstances:

- If required by law or by any regulation which governs us, we will share your information with third parties – these might include governmental or quasi-governmental organisations, law enforcement authorities, courts and arbitrators from time to time;
- We will share your information with production teams to facilitate your participation in a show. We will ensure they confirm to our standard of data protection.

## How long do we retain this information?

**SALES AND MARKETING:** From when we receive your consent to hold this data until you ask us to stop sending you marketing information.

**SUPPLIER INFORMATION:** From our first transaction with you until five years after the last.

**PROSPECTIVE MEMBER INFORMATION:** From receipt of your application until one month after the auditions are held and successful participants notified.

**FORMER MEMBER INFORMATION:** Name and club history in perpetuity for historical purposes unless you exert your right to be forgotten. Other information until you tell us to delete it..

**CURRENT MEMBER INFORMATION:** When you cease to be a member, our membership system will erase all information held about you when it transfers you to former member status. Thereafter, retention will be in line with the above.

### [Do you transfer my information outside of the EEA?](#)

Currently, we do not transfer information out with the European Economic Area (EEA), unless you have asked us to keep in touch and have a postal or e-mail address outside the EEA.

### [Changes in personal information](#)

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. If your personal information does change, please contact the Association's Secretary by e-mail at [secretary@harlequinyouth.co.uk](mailto:secretary@harlequinyouth.co.uk) and our records will be updated.

### [What are your rights?](#)

#### **Your rights in connection with personal information**

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

- **Request access to your personal information (commonly known as a "information 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 correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **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).
- **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.
- **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 the transfer of your personal information.** This enables you to move, copy or transfer your personal information to another party.

### **Who do I contact to exercise my rights or request a transfer of information?**

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer an electronic copy of your personal information to another party, please contact the club Secretary at [secretary@harlequinyouth.co.uk](mailto:secretary@harlequinyouth.co.uk). You will not have to pay a fee to access your personal information (or to exercise any of the other rights).

### **What if I wish to withdraw my 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. To withdraw your consent, please contact the club Secretary. 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.

### **How do I opt out of receiving information?**

If you have subscribed to receive information or updates with the club, and thereby given your consent, you will be contacted with relevant information that you have expressed an interest in or that might be of interest to you. Alternatively, we may have deemed it to be in both our legitimate interests to contact you. With Harlequin you are always in control of your personal information, if at any time you wish us to stop contacting you, please contact the club Secretary.

### **Changes to or queries about the Privacy Policy**

This policy maybe subject to change and material changes were made most recently on 24 May 2018. Your continued use of our Website indicates your consent to any changes we make to this Policy but please continue to visit this page to view any updates.

If you have any queries regarding this policy, please contact the club Secretary.

### **How do I make a complaint?**

You have the right to make a complaint about anything regarding the processing, storage, retention of your information. We would hope to resolve any complaint internally and if you would like to lodge a complaint with us, in the first instance, please contact the club Secretary.

However, you also have the right to lodge a complaint at any time to the Information Commissioner (ICO) in respect of our processing of your personal information. Further information can be found at [www.ico.org.uk](http://www.ico.org.uk).