



# Privacy Policy

**Issued by: Tavistock Repertory Guarantors Ltd.**

**Issue 3.2 : April 2022**

We are Tavistock Repertory Guarantors Ltd, trading as the Tower Theatre Company (“the Tower Theatre”), and our web site is located at <https://www.towertheatre.org.uk> where additional information on [how to find and contact us](#) is available.

## **Introduction**

Welcome to the Tower Theatre's privacy policy.

The Tower Theatre respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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## **1. Important Information and who we are**

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how the Tower Theatre collects and processes your personal data, including any data you may provide through our website when you sign up to our newsletter or purchase tickets to any of our productions or events or join us as a member or a 'friend'.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

The Tower Theatre is the controller and responsible for your personal data (collectively referred to as the Tower Theatre, "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in one of the following ways:

Full name of legal entity: Tavistock Repertory Guarantors Ltd, trading as the Tower Theatre Company

Email address: [info@towertheatre.org.uk](mailto:info@towertheatre.org.uk)

Postal address: 16 Northwold Road, Stoke Newington, London N16 7HR, United Kingdom

Telephone number: 020 7353 1700

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated in January 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and sex.

**Contact Data** includes billing address, delivery address, email address and telephone numbers.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details about payments to and from you such as purchasing tickets for our productions and other events, payments for membership subscriptions, reimbursement of any expenses you incur

**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 this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data 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 goods or services, such as tickets to our productions or access to our membership). 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.

## **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you become a member or friend, create an account on our website, purchase tickets from us, submit information or comments via our web site, complete forms we provide to you, enter our competitions and promotions, make a complaint, give us feedback.

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

**CCTV cameras.** We operate a CCTV camera system at the entrances and exits to the building and in the licenced bar area that records images for the purpose of security and public safety.

## **4. How we use your personal data**

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

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal obligation.

See Section 10 to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the following table.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Take payment for your purchases	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you
Contact you about your purchase	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you
Apply any relevant discounts	(a) Identity (b) Contact	Performance of a contract with you
Take payment of membership/audition fees	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
Sending you information about your membership	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (maintaining up to date records of our members and friends)
Answering your questions and any complaints	(a) Identity (b) Contact	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how you use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Develop new products and services	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to improve the services we provide to you or to identify new services you might be interested in)
Provide user account	All personal information provided by users that register on our website (if any) in their user profile. All users can see, edit, or delete their personal	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to optimise

	<p>information at any time (except they cannot change their username). Website administrators can also see and edit that information. If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser. When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.</p>	<p>users' experience on our website, understanding how our services are used and running our business efficiently)</p>
<p>Enable user comments and user-generated content</p>	<p>The data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available at their website:  <a href="https://automattic.com/privacy/">https://automattic.com/privacy/</a>  After approval of your comment, your profile picture is visible to the public in the context of your comment. If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the web site. If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave</p>	<p>(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to optimise users' experience on our website, understanding how our services are used and running our business efficiently)</p>

	another comment. These cookies will last for one year.	
Provide website editing and content management features	If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after one day.	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to optimise users' experience on our website, understanding how our services are used and running our business efficiently)
Embed content from other websites	(a) Identity (b) Contact (c) Technical Articles on this website may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to optimise users' experience on our website, understanding how our services are used and running our business efficiently)
Administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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 or group restructuring exercise) (b) Necessary to comply with a legal obligation
Deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Use data analytics to improve our website,	(a) Technical	Necessary for our legitimate interests (to define types of

products/services, marketing, relationships and experiences	(b) Usage	customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
Operate a CCTV camera system at the entrances and exits to the building and in the licenced bar area that records images and maintain recordings for 31 days	Identity	(a) Necessary for our legitimate interests (for security and during licensing hours).  (b) Necessary to comply with a legal obligation (for the purpose of law enforcement and public safety. We may share these images with the police force, when requested.)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## Cookies

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser. When you log in, we will also set up several cookies to save your login information and your screen display choices. If you log out of your account, the login cookies will be removed.

If you leave a comment on our site you may opt-in to saving your name and email address in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above:

**Our service providers and advisors:** such as companies that support our IT, help us analyse the data we hold, process payments, provide us with legal or financial advice and generally help us deliver services to you. See below for further explanation about key companies that we share your information with.

**Police and law enforcement:** this is very unlikely but we will share information when necessary to assist with the investigation and prevention of crime.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

### **Direct Marketing**

**Email and post marketing:** If you become a member or decide to subscribe to our newsletter and update emails, we will contact you by email. We will only send marketing messages to you in accordance with the marketing preferences you set when you become a member, consent to receiving our update emails or that you tell us afterwards you are happy to receive.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us or by calling us on 020 7353 1700. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

**MailChimp:** We use a third party provider, MailChimp (a trading name of the Rocket Science Group LLC, a company registered in Georgia, U.S.A). If you sign up for our newsletter and emails then MailChimp will store some of your personal information including your email address, IP address and (using technology called web beacons) information about when you open the email and links you click in the email. You can read more about how MailChimp handles personal information [here](#).

### **Payment processing and finances**

**Stripe:** We use a third-party provider, Stripe (a trading name of Stripe Payments Europe Limited, a company registered in Ireland), to process payments on our behalf when you book tickets or make other purchases via our web site. Stripe may transfer your personal information outside the European Economic Area. You can read more about how Stripe handles personal information [here](#).

**PayPal:** We use a third-party provider, PayPal (a trading name of PayPal (Europe)S.à.r.l. et Cie, S.C.A., a company registered in Luxembourg), to process payments on our behalf when you make purchases by card at our theatre bar. PayPal may transfer your personal information outside the European Economic Area. You can read more about how PayPal handles personal information [here](#).

**GoCardless:** We use a third-party provider, GoCardless (a company registered in England), to set up and manage direct debit payments for membership fees on our behalf. GoCardless may transfer your personal information outside the European Economic Area. You can read more about how GoCardless handles personal information [here](#).

**Intuit:** We use Intuit Limited's Quickbooks software to manage our accounts, including receipts and payments from customers, members and suppliers. Intuit may transfer your personal data outside the European Economic Area. You can read more about how Intuit handles personal data [here](#).

## 6. International transfers

The personal information we collect may be transferred to and stored in countries outside the European Economic Area. For example, see above for details of our email service provider MailChimp and for details of payment processing by Stripe, PayPal and GoCardless. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy policy and applicable EU data protection laws and is respected and kept secure.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

If you want us to establish the data's accuracy.

Where our use of the data is unlawful but you do not want us to erase it.

Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### **THIRD PARTIES**

Service providers who provide IT and system administration services.

Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.