



# Privacy Policy

This privacy notice explains what personal data we gather about you, what we use that data for, and who we give that data to. It also sets out your rights in relation to your personal data and who you can contact for more information or queries.

## **Who we are**

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

## **What personal data we collect and why we collect it**

We will collect personal information from a number of sources. These include :

*Directly from you* : when you become a member, 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, contact us by phone, email or communicate with us directly in some other way.

*Our web site* : we may collect information about how you use them such as which pages you visit while you are browsing our website, specifically:

Your contact details : information that allows us to contact you directly such as your name, email address, telephone number and addresses associated with your membership or booking.

Additional details needed for discounts : information such as your date of birth, confirmation of your status as disabled, unemployed, or a student.

Payment information : information that allow our payment providers to receive payment from you for tickets, membership fees and other purchases, such as your payment card information when you are purchasing tickets via our website and your bank account details so we can set up direct debit payments for membership subscriptions. We also collect information needed if we need to reimburse you for any expenses incurred. **We do not store credit card details nor do we share customer card details with any 3rd parties**

How you use our web site : when you use our website, we may collect information about the pages you look at and how you use them and your computer or device's IP (Internet Protocol) address.

We process some of your personal information to make purchases from us to enable us to perform the contract we have entered into or are about to enter into with you, including :

<b>Purpose</b>	<b>Personal information used</b>
Take payment for purchases	Transaction and payment information

Contact you about your purchase	Postal address, email and/or telephone number
Apply any relevant discounts	Date of birth, confirmation of your status as disabled, unemployed, or a student

We process some of your personal information if you want to become (or audition to become) a member or friend of the Tower Theatre to enable us to perform the contract we have entered into or are about to enter into with you and/or because we have a legitimate interest in maintaining up to date records of our members and friends, including :

<b>Purpose</b>	<b>Personal information used</b>
Take payment of membership/audition fees	Transaction and payment information
Sending you information about your membership	All the personal information we collect
Answering your questions and any complaints	All the personal information we collect

We process some of your personal information because we have a legitimate interest to improve the services we provide to you or to identify new services you might be interested in, including :

<b>Purpose</b>	<b>Personal information used</b>
Develop new products and services	All the personal information we collect

We process some of your personal information because you have provided your consent to the processing; you may revoke your consent at any point :

<b>Purpose</b>	<b>Personal information used</b>
Direct marketing by email and post	Contact details Products and services that we have determined may be of interest to you

Where you use our website we process some of your personal information to provide features such as user accounts and allowing users to leave comments to enable us to perform the contract we have entered into or are about to enter into with you and/or because we have a legitimate interest in optimising users' experience on our website, understanding how our services are used and running our business efficiently, including:

<b>Purpose</b>	<b>Personal information used</b>
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

	<p>delete their personal 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>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 anonymized 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 web site : <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 another comment. These cookies will last for one year.</p>
<p>Provide web-site editing and content management features</p>	<p>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 1 day.</p>
<p>Embed content from other web sites</p>	<p>Articles on this site 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.</p>

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. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground (e.g. fulfilment of a contract and legitimate interest) is mentioned above. We may anonymise and aggregate any of the personal information we hold (so that it does not identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis and improving our site. We may also share this anonymised and aggregated information with third parties.

## Media

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 website.

## Cookies

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 another comment. These cookies will last for one year.

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.

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 1 day.

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.

## ***Who we share your data with***

We share personal information with the following parties :

- *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.

## 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 5700. 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. MailChimp stores data in the U.S.A.; however they are registered with a scheme known as the Privacy Shield, which means they must use personal information in line with a number of principles similar to those set out in European data

protection law. If you contact MailChimp directly about our emails, they may respond directly to you but otherwise they will not contact you. 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](#).

## **Transferring your personal information internationally**

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.

## ***How long we retain your data***

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognize 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.

### ***What rights you have over your data***

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

You have the following rights in relation to your personal information :

- (i) the right to be informed about how your personal information is being used;
- (ii) the right to access the personal information we hold about you;
- (iii) the right to opt-out of receiving direct marketing messages;
- (iv) the right to request the correction of inaccurate personal information we hold about you;
- (v) the right to request the blocking or deletion of your personal information in some circumstances and;
- (vi) the right to request that we port elements of your data either to you or another service provider.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us **by email**, on 020 7353 5700, or at 16 Northwold Road, Stoke Newington, London N16 7HR.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator, details of which can be found at **www.ico.org.uk**. We are here to help and encourage you to contact us to resolve your complaint first.

*This policy was last modified on 13th October 2019*