

# North West Drama Privacy Policy

Last updated: 1st September 2021

by M Wardle (Creative Producer) North West Drama



## **Introduction**

North West Drama is committed to protecting and respecting your privacy.

We are a private limited company and we hold personal data for school staff, festival and workshop participants, suppliers and mailing list subscribers. We will only use the information that we collect about you in accordance with the General Data Protection Regulations 2018 and the Privacy and Electronic Communications Regulations 2003.

This policy explains why and how we collect information about you, and how we store use it.

## **What is Personal Data?**

Personal data is defined to be any information that is relating to an identifiable person who can be directly or indirectly identified. This includes name, address, email, identification number, location data or online identifier. The GDPR applies to both automated personal data and to manual filing systems.

## **How do we collect Personal Data?**

When you contact us, register for a festival project, give us information via our website or sign up to our newsletter, we may retain elements of your personal information.

We sometimes collect personal data for evaluation purposes after your participation in one of our activities.

We do not purchase data on individuals or organisations for unsolicited marketing or any other purpose.

In using our website, participating in our festival projects or workshops or contacting us via any other means, you agree that your personal information may be collected, stored and used by us, for any of the following purposes:

- to fulfil contractual agreements in participating in a festival or other project
- to send you details of our other products and services which we think may interest you, unless you opt out as described in “Your Rights” below
- to allow you to use the full range of applicable resources on our website
- to send you news and updates if you consented to this
- to comply with legal and safeguarding requirements (including reporting to partner organisations and local authorities where this is a legal requirement
- to request your feedback in order to evaluate our work

## **How do we store Personal Data?**

All information we collect is stored on our secure server. Paper documentation is stored securely in the office while being processed and is kept for no longer than necessary for the purposes for

which it is collected. Access to electronic and paper records are restricted to staff with appropriate need for that information.

Occasionally, third parties acting on our behalf (for example, programme printers) may also process information that we collect about you. We have put in place organisational and technical security measures to prevent the loss or unauthorised access of your personal information.

### **Personal Data of Under-16s**

The wellbeing and safeguarding of the children and young people with whom we work is our top priority. Please see our **Safeguarding Policy** for further information on this.

We gain consent from parents/ carers of pupils participating in our festival projects via their school. This consent covers the collection and use of pupil data for printing of performance programmes and for North West Drama and our partner theatres to store and use production images. Neither pupil data or audio/visual media of pupils is stored or used without expressed consent.

Schools who participate in our 'Speech Bubbles' programme use a secure online system to assess referred pupils. This system is accessed only by the programme leader at North West Drama for the purposes of ensuring assessment data is up to date. The data stored in this system is only viewed in anonymised form by London Bubble Theatre for the purpose of project evaluation.

Quantitative data is requested and processed in anonymised form.

We do not collect the personal data of children or young people who participate in workshops or drama days, and we do not collect personal contact details of children or young people under any circumstances.

We do not knowingly collect or maintain personal information from persons under 16 years of age on our website. We will take immediate and appropriate steps to delete any personal information of persons under 16 which have been held without consent.

We recognise that children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased and their right to erasure is particularly relevant if consent was given on their behalf when they were a child.

### **Personal Data of Over-16s**

We collect personal data from you only if:

- where we have your consent to do so
- where we have a contract in place with your employer and require your information as you are a participant in our work
- where the processing is in our legitimate interests and not overridden by your rights

We will make these reasons clear. Our present data will be retained and reviewed in line with our legal basis for keeping this data.

If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect our rights, property, or safety of our users and others, then we will do so.

## **How long do we hold data for?**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service or to comply with applicable legal, tax or accounting requirements).

We may retain elements of your personal information to keep you informed of future NWD projects that we think will be of interest to you. When we have no ongoing legitimate business need to process your personal information, we will either delete, archive or anonymise it.

We store audio/visual media for 5 years, after which we will only continue to store or use it if renewed consent is given.

## **What are your rights?**

You have the following data protection rights:

- You can decide whether or not you wish to receive some or any material from us
- You can object to processing of your personal information or ask us to restrict processing of your personal information
- You can unsubscribe from certain email communications by following the “Unsubscribe” link in the email communication itself
- You can also email [matt@northwestdramaservices.co.uk](mailto:matt@northwestdramaservices.co.uk) in request to access, correct, delete or update your personal information on our systems. We will answer every email as soon as possible.
- If we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. This includes the withdrawal of consent for us to store or use audio/ visual media of you at any time. Please email [matt@northwestdramaservices.co.uk](mailto:matt@northwestdramaservices.co.uk) to this end.

If you have any privacy-related questions or unresolved problems, then please email [matt@northwestdramaservices.co.uk](mailto:matt@northwestdramaservices.co.uk)

We may update or amend this Privacy Policy from time to time, to comply with law or to meet our changing business requirements. When we update it we will take appropriate measures to inform you, consistent with the significance of the changes we make.

*In this policy, references to “we” or “us” are to North West Drama Services Limited, a private and limited company incorporated in England and Wales (registered number 6852812)*

Policy written by:



Matt Wardle (Creative Producer)

Date: 1st September 2021