

PRIVACY STATEMENT FOR BOX OFFICE & VISITORS

1. DATA CONTROLLER

- 1.1 For the purpose of the DPA and GDPR the Data Controller is Trinity Laban Conservatoire of Music and Dance (Trinity Laban or the Conservatoire). Our Registration Number in the Data Protection Public Register is Z6341141.
- 1.2 Trinity Laban is committed to protecting your personal information and being transparent about what information we hold in accordance with the Data Protection Act and the General Data Protection Regulations. Our Data Protection Officer is the Director of Operations and Business Enterprise, who can be contacted on 020 8305 4372 or at Trinity Laban Conservatoire of Music and Dance, King Charles Court, Old Royal Naval College, Greenwich, London SE10 9JF or DataProtection@trinitylaban.ac.uk.

2. PURPOSE

- 2.1 We are committed to protecting your personal information and being transparent about what information we hold about you.
- 2.3 Using personal information allows us to develop a better understanding of our patrons and in turn to provide you with relevant and timely information about the work that we do.
- 2.3 The purpose of this statement is to give you a clear explanation about how we collect and use the information we collect from you directly.

3. THE LAWFUL BASIS FOR OBTAINING AND USING YOUR DATA

- 3.1 Article 6 of the EU GDPR Regulations concerns the “Lawfulness of Processing” and the following three definitions provide Trinity Laban’s legal bases for processing data in relation to the Trinity Laban Box Office:

6(1) (b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example, we may need to contact you by email or telephone in the case of cancellation of a show, or in the case of problems with your payment.

6(1) (f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

In certain situations we collect and process your personal information for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way.

6(1) (a) – Consent of the data subject

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

4. WHAT DATA DO WE COLLECT?

4.1 *Information you give us*

We keep a record of, and process, data when a transaction is made online, in person or over the telephone to Trinity Laban's Box Office. This can include information such as your name, email address, postal address, telephone number and card details. We will also store a record of your purchases and donations.

4.2 *Information about your interactions with us*

When we send you a mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on. When you visit our website, we collect information about how you interact with our content.

4.3 *Information from third parties*

We occasionally receive information about you from third parties. For example, when a Trinity Laban performance is taking place at an external venue and where an appropriate data sharing agreement is in place.

5. WHAT DO WE DO WITH YOUR DATA?

5.1 *Marketing and Communications*

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this, we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. In the case of email, we will give you an opportunity to opt out of receiving them during your first purchase with us. If you do not opt out, we will provide you with an option to unsubscribe in every email we subsequently send you, or you can alternatively use the contact details at the end of this policy.

We may also contact you about our work by telephone however we will always get explicitly consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to your purchases.

5.2 *Other processing activities*

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

TRINITY LABAN CONSERVATOIRE OF MUSIC & DANCE

- We may analyse data we hold about you to ensure that the content and timing of communications we send you are as relevant to you as possible.
- In order to improve our website we may analyse information about how you use it and the content and ads that you interact with. You may also see adverts from us on social media that are tailored to your interests.
- For the purposes of recording memberships and managing our supporter relations, we will share data with Trinity Laban's Development and Alumni Department Database (Raisers Edge).
- For the purposes of the smooth running of events, we may share data with front of house staff.
- We may analyse data we hold about you in order to identify and prevent fraud.

5.3 **Your debit and credit card details**

Your data is stored on our Box Office system (Spektrix). If you use credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

We optionally allow you to store your card details for use in future transactions. This is carried out in compliance with PCI-DSS and in a way where none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

6. **WHEN WE SHARE YOUR DATA**

6.1 Other than where Trinity Laban has a legal obligation, data is not normally shared with any external third party unless Trinity Laban has your express consent to do so.

6.2 The only occasions on which Trinity Laban might have to share data with a third party without express consent would be when the following condition for lawful processing would apply:

6(1) (d) – Processing is necessary to protect the vital interests of a data subject or another person

6(1) (e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

6.3 For example, we may share your data with our own service providers who process data on our behalf and on our instructions, for example with our ticketing system software provider or with mailing houses for postal mailings. In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.

7. **HOW LONG WE KEEP YOUR DATA**

7.1 We store your personal information indefinitely such that for any subsequent purchases you make we are able to link them back to a single unique record that we hold for you on our system.

8. HOW YOU CAN ACCESS YOUR DATA

- 8.1 To access your data online and to update your preferences, please log into your account.

Alternatively, you can contact Trinity Laban's Box Office on 020 8463 0100 (open Mondays-Fridays, 10am-4pm).

9. WHAT CAN YOU DO IF YOU WANT TO COMPLAIN ABOUT HOW YOUR DATA IS BEING USED?

- 9.1 Trinity Laban would wish to resolve any issues informally and reach an amicable agreement with the complainant. However, if the matter cannot be resolved then the data subject may discuss the issue further with the ICO.

This Privacy Statement was last updated on 17th May 2018