

## ANDREW CURPHEY THEATRE COMPANY LTD – PRIVACY POLICY

Andrew Curphey Theatre Company Ltd, a company registered in England and Wales, with company number 08030627 (**we, us or our**), understands that protecting your personal data is important. This Privacy Policy sets out our commitment to protecting the privacy of personal data provided to us, or otherwise collected by us when providing our website, stage school and performing arts classes (**Services**) or when otherwise interacting with you.

It is important that you read this Privacy Policy together with any other detailed privacy notices we may provide when we are collecting or processing personal data about you so that you understand our privacy practices in relation to your data.

### The information we collect

**Personal data:** is information that relates to an identified or identifiable individual.

#### Where you are a parent or guardian of a client of ours:

We may collect, use, store and disclose different kinds of personal data about you which we have listed below:

- **Identity Data** including first name, last name and gender.
- **Contact Data** including billing address, residential address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party booking partner, ClassForKids).
- **Transaction Data** including details about payments from you to us and other details of products and services you have purchased from us.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.

We may also collect, use, store and disclose different kinds of personal data about your child which we have listed below:

- **Identity Data** including first name, last name, title, date of birth, gender, images and videos.
- **Contact Data** including residential address, school name and school address.
- **Emergency Data** including the name of an emergency contact, the relationship and a contact number for the emergency contact.
- **Special Categories of Personal Data** is a special category of personal data that 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. The types of special categories of data we collect include health information such as allergies or any special educational needs.

#### Where you are a client of ours over the age of 18:

We may collect, use, store and disclose different kinds of personal data about you which we have listed below:

- **Identity Data** including first name, last name and gender.
- **Contact Data** including billing address, email address and telephone numbers.

- **Emergency Data** including the name of an emergency contact, the relationship and a contact number for the emergency contact.
- **Financial Data** including bank account and payment card details (through our third party booking partner, ClassForKids).
- **Transaction Data** including details about payments from you to us and other details of products and services you have purchased from us.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Special Categories of Personal Data** is a special category of personal data that 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. The types of special categories of data we collect include health information such as allergies or any special educational needs.

### How we collect personal data

We collect personal data in a variety of ways, including:

- **Directly:** We collect personal data which you directly provide to us, including when you register yourself or your child for a class, through the ‘contact us’ form on our website, or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal data which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal data from third parties, such as from ClassForKids and details of your use of our website from our analytics and cookie providers and marketing providers. See the “Cookies” section below for more detail on the use of cookies.

### Purposes and legal bases for processing

We collect and process personal data about you only where we have legal bases for doing so under applicable laws. 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 reach out to us if you need further 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 table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To provide our Services to you, including to register your attendance at our classes and events and manage your appointments.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Transaction Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>

To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions.</li> </ul>
To contact and communicate with any emergency contacts or next of kin where necessary.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Emergency Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests: to ensure your child is safe, and ensure your child's wellbeing during our provision of the Services to them.</li> </ul>
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• To comply with a legal obligation</li> <li>• Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our terms of business and any other administrative points.</li> </ul>
For analytics, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> <li>• Technical and usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy</li> </ul>
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical and usage Data</li> <li>• Profile Data</li> <li>• Marketing and communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to develop our Services and grow our business</li> </ul>
To run promotions, competitions and/or offer additional benefits to you.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Interaction Data</li> <li>• Marketing and communications Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to facilitate engagement with our business and grow our business</li> </ul>
If you have applied to work with us; to consider your application.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Professional Data</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests: to consider your employment application</li> </ul>
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> <li>• All relevant Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>• To comply with a legal obligation</li> </ul>

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

### **Our disclosures of personal data to third parties**

We may disclose personal data to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as Google Drive, Wix and Cognito Forms;
- marketing or advertising providers such as ClassForKids;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- booking portal operators or payment systems operators such as ClassForKids;
- our existing or potential agents or business partners;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as Cognito Forms; and
- any other third parties as required or permitted by law, such as where we receive a summons.

### **Overseas transfers**

Where we disclose personal data to the third parties listed above, these third parties may store, transfer or access personal data outside of the United Kingdom, including [All over the world, including Europe, the US and Ireland]. The level of data protection in countries outside of the United Kingdom may be less comprehensive than what is offered in the United Kingdom. Where we transfer your personal data outside of the United Kingdom, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal data in accordance with this Privacy Policy. This includes:

- only transferring your personal data to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal data; or
- including standard contractual clauses in our agreements with third parties that are overseas.

### **Data retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

## Your rights and controlling your personal data

**Your choice:** Please read this Privacy Policy carefully. If you provide personal data to us, you understand we will collect, hold, use and disclose your personal data in accordance with this Privacy Policy. You do not have to provide personal data to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal data about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal data about somebody else, you represent and warrant that you have such person's consent to provide the personal data to us.

**Access, correction, processing and portability:** You may request details of the personal data that we hold about you and how we process it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal data rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal data to a third party and, in some circumstances, to have personal data relating to you transferred to you or another organisation.

**Unsubscribe:** To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Withdraw consent:** Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. 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.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. 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.

## Storage and security

We are committed to ensuring that the personal data we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal data and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

## Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences and to provide a better user experience. Cookies, by themselves, do not tell us your email address or other personally identifiable information. If you choose to provide our online services with personal data, this data may be linked to the data stored in the cookie. Where required by law, we will always seek your consent before placing any non-essential cookies on your device. For more information about the cookies we use, or to update your consent preferences, please see our Cookie Policy available at [<https://www.actheatrecompany.co.uk/cookiepolicy>].

## Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal data which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Amendments

We may change this Privacy Notice from time to time. We will notify you if we make a significant change to this Privacy Notice, by contacting you through the contact details you have provided to us and by publishing an updated version on our website. **For any questions or notices, please contact at:**

Andrew Curphey Theatre Company Ltd, a company registered in England and Wales, with company number 08030627.

Email: [office@actheatrecompany.co.uk](mailto:office@actheatrecompany.co.uk)

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