**Prime Theatre Privacy & Data Protection Policy**

Prime Theatre will adhere and aim to be fully compliant to the General Protection Regulation which will be brought into force 25th May 2018. This policy will supersede any previous data protection policies and aims that all staff are fully aware of their duties.

For the purposes of the GDPR policy in lines with the regulation data is termed as that of a natural living person and not those who are deceased or that of a company, (contacts within a company are included)

Prime Theatre holds data for different purposes, however only data that is needed is held and processed. Prime Theatre is commitment to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with all our legal obligations.

The Principles

Prime Theatre shall comply with the principles of data protection as listed in the Regulation. We will make every effort possible in what we do to comply with these principles. The Principles are:

1) Lawful, fair and transparent - Data collection must be fair, for a legal purpose and we must be open and transparent about how the data will be used.

2) Limited for its purpose - Data can only be collected for a specific purpose.

3) Data minimisation - Any data collected must be necessary and not excessive for its purpose.

4) Accurate - The data we hold must be accurate and kept up to date.

5) Retention - We cannot store data longer than necessary.

6) Integrity and confidentiality - The data we hold must be kept safe and secure.

Accountability and transparency

We will ensure accountability and transparency in all our use of personal data. We must show how we comply with each Principle. Prime Theatre are responsible for keeping a written record of how all data processing activities, and ensuring we comply with Principles listed in the previous section of this document.

To comply with data protection laws and the accountability and transparency Principle of GDPR, we must demonstrate compliance. We are responsible for understanding the responsibilities to ensure we meet the following data protection obligations:

▪ Fully implement all appropriate technical and organisational measures

▪ Maintain up-to-date and relevant documentation

▪ Providing GDPR training and awareness to all those who work at Prime Theatre, including Freelance staff

▪ Logging any data breaches

▪ Continual data cleansing and disposal through secure means

▪ Provide our customers with a clear and easy data withdrawal process

**Types of Data we Hold**

Youth Theatre Members Data

A child under 16 cannot give consent themselves, someone with parental responsibility must provide the consent

By becoming a member consent is automatically given for Prime Theatre to hold relevant personal data. This data will only be used to create registers, emergency contact details and databases for administration purposes. Details will also be used to disseminate important information. Members information will never be shared with other members.

Prime Theatre use ClassManager to hold Youth Theatre members details. Their GDPR statement can be found here <https://classmanager.com/gdpr/>

Members full data will be kept for the length of the membership and up to two years after a member has informed the company of leaving. On leaving, permission will be requested to add details to the general mailing list. After the two years names only will be added to a past members list and all other data deleted.

Mailing List

A mailing list is kept informing those on it of productions and information about the company. People can choose to sign up or permission is sort before they are added to the mailing list. Those on the mailing list will be given the opportunity to ‘opt out’ of receiving data with every communication, whether email or post.

As part of Prime Theatre’s marketing practices a third party is used to send bulk emails. This is currently Mailchimp Data is shared with them. There policy can be found here <https://mailchimp.com/help/about-the-general-data-protection-regulation/>

Staff

Information about staff will be kept to process contracting and pay. All data is relevant and stored securely. Data is used by a third party to administer payroll. This data is transferred securely using password protected documents.

Processing data

Data will be processed fairly and in a transparent manner, Prime will only collect data for a specific purpose explained to the data subjects. Data will only be used for what it was collected for, this data will be accurate and kept up to date. Any out of date or inaccurate data will be erased or rectified.

Certain sensitive data will need to be collected from all participants and those that interact with the company for reporting to Arts Council England purposes. This information will be kept securely and subjects will not be able to be identifiable from data given to Arts Council England.

Any data the company holds will have been obtained by one of the following means:

* Consent given by the subject **(Mailing List)**
* Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
* Processing necessary for compliance with a legal obligation
* Processing is necessary to protect the vital interest of a data subject or another person
* Processing is necessary for the performance of a task carried out in the public interest in the exercise of official authority vested in the controller
* Necessary for the purposes of legitimate interests pursued by the controller or a third party, expect where such interests are overridden by the interests, rights of freedom or the data subject.

Data Controller

The amount of data that Prime Theatre holds is not big enough to have a Data Controller but the Trustees will always appoint a data administrator that will make sure data is being used and stored in line with this policy. The board of Trustees will also review this policy annually, if a breach occurs or if new amendments to the regulation are introduced in line with ICO regulations.

Data Processors

All staff at Prime Theatre are data processors, all have been given relevant training in the regulation. They will adhere to

* Ensure the security of the processing
* Keep accurate records of processing activities
* Notify the Data Administrator/Board of any data breaches

Data Storage

All documents that have personal data on them are either in hidden files that only senior staff members have access to or are password protected. No data will be held on personal computers/USB or unsecured services.

Youth Theatre registers are now on ClassManager that are only accessible with an email login.

Paper copies of any information will only be printed when necessary such as during productions or when events are happening off site and these will be kept in a file by the Stage Manager, Director or Leader.

Data will be regularly audited to make sure it is still relevant, if deemed not, it will be removed from systems.

Data Sharing

Prime Theatre will never give identifiable personal data to another company. If it is requested by an outside company the data subject will be given that company’s information and it will be their decision to contact them.

Sometimes Prime will need to report to funders and Arts Council England. In these cases all data is anonymised and when collected people will be informed that it will be used for this reason

Viewing Data/Right to Erasure

Anyone whose data is held by the company has the right to either view the data being held or to ask for their data to be erased. Prime Theatre will provide all data held by the company to its owner within 30 days of the request.

If someone requests to be erased for records, all data will be identified then removed, this will include any back up data storage. We will not be able to erase any data that has been published in print such as names in Show Programmes.

We will not be able to continue with the request if any of the following apply:

* If a member of Prime Youth Theatre and wish to continue to be
* To exercise the right of freedom of expression and information
* To comply with the legal obligation for an official authority
* For the establishment, exercise or defence of legal claims
* For archiving in the nations interest

Data Breaches

If there is a data breach it will reported to the ICO under the GDPR breach notifications within 72 hours of finding the breach. (weekends are included in this time) The subject of the breach will only be notified if it is likely to result in a risk of rights and freedoms. If a breach occurs processes and policies will be reviewed and updated.

ICO Data Protection fees

Prime Theatre is exempt from paying fees as it is a not for profit organisation, if the situation within the company changes this will be addressed.