

Data Privacy Notice

About this Data Privacy Notice

Your Personal Information

The Egg Assembly is an operational agent of The Theatre Royal Bath (TRB). The Egg Assembly is committed to keeping your personal information safe. We need to collect because we have made commitments to ensure that we are an inclusive assembly and need to hold ourselves accountable to that commitment. We may also use personal information provided to keep you informed about our shows, events and other services, and so that you can purchase and pay for tickets and use our services.

When we collect and use your personal information we will keep to the applicable law concerning the protection of personal information, including the Data Protection Act 1998 and the General Data Protection Regulation.

This Data Privacy Notice tells you what personal information we collect from you and what we do with it, when you do any of the following:

- ◆ when you use The Egg Assembly website at www.theeggassembly.com;
- ◆ when you use the Theatre Royal Bath Box Office online systems via The Egg Assembly.
- ◆ When you partake in and complete DATA capture forms and questionnaires issued by The Egg Assembly.
- ◆ When you take part in Egg Assembly courses and workshops.
- ◆ When we correspond with you by letter, by post, by email, (including generic email bulletins) and by telephone, SMS/text message.

Who collects your personal information?

The Egg Assembly is an operational agent of The Theatre Royal Bath (TRB). Theatre Royal Bath Limited, ("TRB") is the entity which collects and uses ('processes') your personal information.

TRB is the data controller for all the personal information about you that we collect, hold and use.

Theatre Royal Bath Limited is a company limited by guarantee registered in England and Wales under company number: 01416448. TRB is a registered charity, registered with the Charity Commission under number: 277723.

We use some third parties to help us collect, process, and safely store the personal information about you that we collect and use. These third parties are referred to as 'data processors'.

Our data processors include:

- ◆ The Egg Assembly website analytics provider, Google Analytics - anonymised data
- ◆ The Egg Assembly website development partners, Atomic Smash

- ◆ Our Research Partners, Bath University, who may hold specific data, securely, for individual research projects.
- ◆ The Egg Assembly's Social Media providers inhouse analytical "insights" providers - more information can be found on these on the relevant sites.
- ◆ The provider of our box office ticketing system, Spektrix Limited;
- ◆ The provider of our online mailing systems, Dot Mailer

We have explained in more detail below about our data processors and what they can do with your personal information.

How do we collect and use your personal information?

We collect your personal information from you when you use The Egg Assembly website at www.theeggassembly.com; when you use the Theatre Royal Bath Box Office online systems via The Egg Assembly; When you partake in and complete DATA capture forms and questionnaires issued by The Egg Assembly; When you take part in Egg Assembly courses and workshops; when we correspond with you by letter, by post, by email, (including generic email bulletins) and by telephone, SMS/text message.

Sometimes, we may ask to collect personal information from you when you attend a show or other event in person at the Theatre Royal Bath, the Ustinov or the egg.

What information about you do we collect and use?

We will collect all or some of the following information:

Personalised Information

- ◆ Full Name and Title
- ◆ Email Address
- ◆ Phone Numbers
- ◆ Date of Birth/Age
- ◆ Delivery Address
- ◆ Billing Address
- ◆ Access requirements
- ◆ TRB Friends or Associate membership
- ◆ Purchase History
- ◆ Donation History and Pledges
- ◆ Gift Aid status
- ◆ Gender
- ◆ Marketing Preferences

- ◆ Card Details (for purchases and so that optionally you can store your card information for future purchases)
- ◆ Bank Details (for Direct Debits)
- ◆ Email and Newsletter records including emails sent, emails opened by you, and links opened by you
- ◆ Publicly Accessible Profile Information from the internet including Facebook, Instagram and Twitter

Anonymised Information

- ◆ IP address
- ◆ Operating system
- ◆ Cookies

For what purposes do we collect and use your personal information?

Unless you ask us to stop collecting and using your personal information, we need to collect and use your personal information so that:

- ◆ you can book and pay for tickets when you book using The Egg Assembly website (and associated TRB Spektirx systems), when you visit the TRB box office in person, and /or when you book over the telephone. (We have explained in more detail below what happens to your personal information when you book tickets or workshop places);
- ◆ you can create a user account when you use The Egg Assembly website, when you interact with TRB's Spektrix systems, when you telephone us and/or when you visit the TRB box office in person; you can give money donations to TRB either as a one-off payment, or using a regular direct debit;
- ◆ you can receive information from us about shows, events, and workshops that you have booked, including important information relating to shows, events, and workshops such as cast changes, course requirements or cancellations;
- ◆ you can receive information from us about shows, events, and workshops at the Theatre Royal Bath, the Ustinov Studio, The Egg and/or The Egg Assembly that are similar to shows, events, and workshops that you have previously booked;
- ◆ you can receive information about future shows, events, and workshops at the Theatre Royal Bath, the Ustinov Studio, The Egg and/or The Egg Assembly;
- ◆ you can become a Friend or Associate member of the Theatre Royal Bath and benefit from the advantages offered by Friends or Associate membership;
- ◆ you can receive information about how you can support or donate to the Theatre Royal Bath, the Ustinov Studio, The Egg and/or The Egg Assembly
- ◆ Specific research projects can be undertaken, widening our cultural and industry based understanding of both our audiences and products/services, for purposes of improving our practices, and that of our wider industry.

if we have your permission to do this;

- ◆ you can store saved shopping carts as you navigate our websites;
- ◆ occasionally, we can contact you with post show and event surveys;
- ◆ we can obtain feedback and evaluate the shows, events and services that we provide and our facilities, for analytical purposes, for reporting purposes and to improve our shows, events, services and facilities for the future;
- ◆ using Cookies, we can identify recurring visitors to the our websites and analyse their browsing habits within the websites;
- ◆ we can, occasionally, use photographs and videos taken of our members, our audiences and theatre-goers and patrons so that we can promote our shows, events, and workshops or add to and/or maintain our TRB theatre archives or use the information for reference purposes;
- ◆ we can investigate complaints, legal claims or important incidents, including to maintain health and safety standards or child protection standards

What legal reasons do we have which allow us to use and collect your personal information?

There are three different legal reasons ('lawful bases') under which we may use and collect your personal data.

For the purpose of performing a contract with you

When you buy tickets or other services from us and/or when you take our Friends or Associate membership of TRB, or when you make a donation to us, you are entering into a contract with us.

So that we can perform this contract we need to process and store your personal information to:

- ◆ Take your name address, contact details and payment details so that you can book and pay for tickets and services from us or make a donation when you visit the our box offices in person, when you use the our website and/or when you contact us by telephone or by post;
- ◆ Confirm your booking by way of a confirmation email, send your tickets or materials to you in the post, or to confirm your identity if you collect your tickets or materials in person at our box offices;
- ◆ Send you information from us about shows, events, and workshops that you have booked, including important information relating to shows, events, and workshops such as cast changes, course requirements, or cancellations; accept and process your Friends or Associate membership of TRB and send you information about shows, events, services, workshops and booking periods which will enable you to take advantage of your membership of TRB.

When we have your explicit consent

Sometimes, we will need to ask you for your express consent before we can use your personal information for certain purposes.

We will update your consent from time to time.

You have the right to withdraw consent at any time, and this can be done via the our website, by contacting the our box offices, or by contacting the our Data Protection Officer.

Examples of when we may need your express consent to use your personal information include:

- ◆ So that we can contact you in connection with fundraising campaigns;
- ◆ To thank you for donating to us and to tell you how your money will be well spent;
- ◆ To share your personal information with third parties who would like to contact you, if you have provided your consent.

For our legitimate business interests

We collect and process your personal information for purposes that are in our legitimate business and organisational interests.

We do this carefully, and in a way that we believe does not result in harm to you or to your right to have your personal information collected and used in a way which is fair and lawful.

If we process your personal information for our legitimate business interests then you have the right to object to TRB collecting and using your personal information on this basis. Your right to object is explained later in this Data Privacy Notice

Examples of when we collect and use your personal information for our legitimate business interests include the following purposes - so that:

- ◆ we can analyse the data we hold about you in order to identify and prevent fraud;
- ◆ we can analyse the way in which The Egg Assembly website is used and the content and links that you interact with in order to improve the website;
- ◆ you can create a user account when you use The Egg Assembly website, when you interact with TRB's Spektrix systems, when you telephone us and/or when you visit the TRB box office in person; you can give money donations to TRB either as a one-off payment, or using a regular direct debit;
- ◆ You can receive information from us about shows, events, and workshops at the Theatre Royal Bath, the Ustinov Studio, The Egg and/or The Egg Assembly that are similar to shows, events, and workshops that you have previously booked;
- ◆ You can receive information about future shows, events, and workshops at the Theatre Royal Bath, the Ustinov Studio, The Egg and/or The Egg Assembly, if we have your permission to do this;
- ◆ You can become a Friend or Associate member of the Theatre Royal Bath and benefit from the advantages offered by Friends or Associate membership;
- ◆ You can receive information about how you can support or donate to the Theatre Royal Bath, the Ustinov Studio, The Egg and/or The Egg Assembly;
- ◆ You can store saved shopping carts as you navigate around the our website and associated Spektrix systems;
- ◆ We can contact you with voluntary surveys;
- ◆ We can obtain feedback and evaluate the shows, events and services that we provide and our facilities, for analytical purposes, for reporting purposes and to improve our shows, events, services and facilities for the future;
- ◆ Using Cookies, we can identify recurring visitors to The Egg Assembly and TRB websites, and analyse their browsing habits within the websites;

- ◆ We can, occasionally, use photographs and videos taken of our members, audiences, theatre-goers and patrons so that we can promote our shows and events or add to and/or maintain our TRB theatre archives or use the information for reference purposes;
- ◆ We can investigate complaints, legal claims or important incidents, including for maintaining health and safety standards and child protection;
- ◆ We can maintain notes of our customers according to customer booking and donation history, and other personal customer account data that you provide us, as well as publicly available internet research for the purposes of our marketing communications to you, and to enable us to communicate in a relevant way with you, but not to make any automated decisions based on profiling of any consequence to you whatsoever.

What happens when you book tickets?

For the purposes of this document, tickets refers to both ticketed shows and events, and places on workshops and courses.

When you book and pay for tickets for our shows and events, or when you buy other services using the TRB website, over the telephone, by post or when you visit the TRB box office in person, the provider of our box office ticketing system, Spektrix will receive your personal information so that you can book and pay for your tickets and services.

Spektrix is a data processor for TRB and does not use your personal information for any other purpose apart from processing your purchases. Your personal information within the Spektix booking system is held securely in a cloud based system.

Cookies and using the TRB website

Our website provider may use Cookies on your computer. A Cookie is a small file that sits on your computer's hard drive and Cookies make it possible to track your visits to The Egg Assembly website and to use certain services on The Egg Assembly website such as online booking and payment.

Our website provider is a data processor for The Egg Assembly. We cannot identify any individual persons from the Cookie data but the data is used to analyse how long people spend on The Egg Assembly website and what sections of The Egg Assembly website people view.

You can delete Cookies, but you may lose any stored information that enables you to access The Egg Assembly website more quickly.

Your website browser will allow you to choose whether to accept or disable Cookies in your web browser. Your website browser will automatically accept Cookies, but you can change this.

For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of services available on The Egg Assembly website.

The Egg Assembly uses Google Analytics to collect information about how people use The Egg Assembly website. We do this to make sure the website is meeting its users' needs and to understand how we could improve things.

Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on.

The Egg Assembly cannot identify any individual persons from the information provided by Google Analytics. The data includes:

- ◆ data stored by cookies: _utma stores each user's number of visits, time of the first visit, the previous visit and the current visit; _utmb and _utmc check how long a visitor stays on the site: when a visit starts and ends; _utmz tracks where a visitor came from (search engine, search keyword, link); _utmv and _utmd track visitor journeys through the site and classifies them into groups;
- ◆ duration of cookies: _utma expires two years after your last visit to this site; _utmb expires 30 minutes after your visit, or after 30 minutes of inactivity; _utmc expires at the end of a session (when you close your browser); _utmz expires six months after it was last set; _utmv (not set) expires immediately; _utmd (not set) expires immediately

Using The Egg Assembly website

You can use certain areas and features of The Egg Assembly website without providing any personal information or other data at all. However, if you want to use all the services available on The Egg Assembly website you may need to submit personal information or other data.

You do not have to provide us with all the information we may ask you for. It is up to you.

All debit and credit card information is processed securely, and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS) and handled by Spektrix. They optionally allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS.

How do we store your personal information?

We take all the precautions that we can to make sure that your personal information is stored securely. Electronic information is kept on servers in a secure environment. Your credit and debit card information is encrypted and secured in a cloud based system by Spektrix.

No website can be completely secure; if you have any concerns that your account could have been compromised, e.g. someone could have discovered your password, please get in touch straight away by contacting joe.spurgeon@theatreroyal.org.uk

We make sure that any third parties we use for processing your personal information keep your personal information safe and secure. We have internal Data Protection Policies and Procedures and provide our staff with regular data security training. Our policies and procedures are overseen and reviewed regularly by The Egg Assembly Management Team and the Trustees of TRB.

Whenever your information is stored online, we have a data sharing agreement with the data processor which states the security requirements for your personal data. If there is a data security breach then the data processor must tell us immediately and we will then tell you if we are required to do so by law.

For how long do we keep your personal information?

We will only keep your personal information for as long as we need to. We have a data retention policy which determines the length of time records should be kept. In some cases we are required by law to retain certain financial records for set periods of time, and these circumstances override our other retention periods.

We will ask you to check and update your contact preferences periodically so that we know our database is up to date. You can withdraw your consent, or make changes to your contact preferences at any time.

We actively maintain customer data, including communications with you, previous records or ticket, donations, membership status and other purchase histories to allow you to sign in to your

account even if you have not booked with us for a while, and to continue to allow you to update and make changes to your marketing preferences. This also allows us to look up your customer account if you book with our box office staff.

If your account has had no activity for some time, before it has gone 6 years with no activity, it will be made inactive from our database, thereby restricting access to the information, but it is stored indefinitely such that for any subsequent enquiry or activity you make we are able to link back to a single unique record that we hold for you on our system. We retain Cookies information as set out above. We retain any complaints, queries or written communications with you for 6 years.

When TRB no longer needs to keep your personal information, it is deleted or securely destroyed.

You have the right to request we remove the information we store about you. Please contact us, and we will be happy to arrange this for you if you want us to. Any objections you make to any processing of your data will be stored against a record on our system so that we can comply with your request.

With whom do we share your personal information?

We do not sell any of your information for the purposes of marketing or fundraising. We do not share your personal information with third parties, unless you have given us specific consent to do so, or if we are required to do so by law or to comply with a Court Order.

However, we do share your personal information with the data processors identified above.

Where we use third party data processors, they can only use your information for the purposes that we have agreed with them. Any use for other purposes is strictly prohibited within a data sharing agreement between us and the data processor.

What rights do you have in relation to your personal information?

You can:

- ◆ object to processing of personal data that is likely to cause, or is causing, damage or distress;
- ◆ object to the processing of your data where The Egg Assembly relies on its legitimate interest as the legal grounds for processing;
- ◆ prevent processing of your personal data;
- ◆ port your data using an open format document, like a .csv Excel document;
- ◆ object to decisions being taken by automated means;
- ◆ in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- ◆ and claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a question about your personal data, this policy or how we use and process your personal information, you should contact: lindsay.baker@theatroyal.org.uk.

You have the right to complain.

If you have a complaint about the way we are collecting or using your personal data, please contact The Egg Assembly in the first instance. Alternatively, you have a right to complain to the Information Commissioner's Office at ico.org.uk/concerns

How to access your personal information (Subject Access)

You have the right to be told about the type and nature of the personal information that TRB holds about you, and why we are holding and using it. You also have the right to rectify any inaccurate information we hold about you. Requests must be made in writing (not verbally).

There is no fee for Subject Access Requests. In certain situations, The Egg Assembly is allowed to refuse your request, otherwise we will comply within one calendar month.

The Egg Assembly's response will cover the following detail:

- ◆ any personal data that is being processed;
- ◆ a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- ◆ a copy of the information comprising the data; and details of the source of the data.

If you require Subject Access Requests or our response to them in braille or any other format please contact us and we will happily arrange this as quickly as possible.

Updates

This Notice is dated 18th January 2021.