



**Number 8**

CINEMA - THEATRE - GALLERY

Box Office: 01386 555488

Administration: 01386 555028

Email: [enquiries@number8.org](mailto:enquiries@number8.org)

8 High Street, Pershore, WR10 1BG

[www.number8.org](http://www.number8.org)

## Number 8 Privacy Policy

### What Does this Privacy Policy Cover?

Personal Data is any data relating to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

The processing of Personal Data is governed by the General Data Protection Regulation 2016/679 (the 'GDPR'). Number 8 respects your privacy and is committed to protecting your Personal Data. We want to be transparent with you about how we collect and use your Personal Data in making available our services, and our website [www.number8.org](http://www.number8.org) (our 'Site'), and tell you about your privacy rights and how the law protects you.

Any modifications or changes to this Privacy Policy will be posted on our Site and an up to date version will be available from our Box Office.

### Who Are We & How Can You Contact Us?

Number 8 Ltd. is the Data Controller (for the purposes of the GDPR) of your Personal Data (referred to as either "**Number 8**", "**we**", "**us**" or "**our**" in this Privacy Policy).

Our address is: Number 8, 8 High Street, Pershore, Worcestershire, WR10 1BG.  
You can contact us at the address above, by emailing: [enquiries@number8.org](mailto:enquiries@number8.org) or by calling our Box Office on 01386 555488.

### What Personal Data Do We Collect?

Depending of your use of our services, and/or of our Site we may collect some or all of the Personal Data listed in the table below.

Category of Personal Data collected	What this means
Identity Data	First name, surname, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, parental/guardianship responsibility status.
Contact Data	Your home address, work address, billing address, email address and telephone numbers. Emergency contact numbers where applicable.
Financial Data	Your bank account and payment card details.

Transaction Data	Any details about payments to and from you and other details of subscriptions and services you have purchased from us.
Marketing and Communications Data	Your preferences in receiving marketing from us and our third parties and your communication preferences.
Behavioural Data	Inferred or assumed information relating to your behaviour and interests, based on your online activity. This is most often collated and grouped into “segments” (e.g., there may be a segment for men, living in Pershore, over the age of retirement, who like sports).
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website or use our services.
Medical Data	For those enrolling for participatory activities (e.g. workshops, dance classes or youth theatre) only - information regarding medical conditions is collected.

### **Aggregated Data**

We also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data, but once in aggregated form it will not constitute considered Personal Data for the purposes of the GDPR as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

### **Special Categories of Personal Data**

We do not generally collect any “**Special Categories of Personal Data**” about you (this 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). Nor do we collect any information about criminal convictions and offences.

There are exceptions to this general rule in relation to information collected from those enrolling for participatory activities and staff and personnel involved in the delivery of our activities for children or vulnerable adults. From those enrolling for participatory activities, with their (or in the case of children, their parent/guardian’s) explicit consent, we collect information relating to medical conditions that are relevant to their participation in the activity. As part of the recruitment or redeployment process information about criminal convictions and offences of staff and volunteers is collected when necessary in order to meet our legal obligations in relation to employment, and social protection law.

## How Do We Use Your Personal Data?

Number 8 complies with its obligations under the GDPR by keeping personal data up to date, by storing and destroying it securely, by not collecting or retaining excessive amounts of data, by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your Personal Data for the following purposes:

- To enable us to provide a service for the benefit of the public in a particular as specified in our constitution
- To recruit and manage our employees and volunteers
- To register you as a new customer, provide and manage your account
- To offer and supply our products and/or services to you (we require your personal data in order to enter into a contract with you). This includes managing any payments, fees and charges and the processing of gift aid applications
- To administer membership records and payments
- To maintain our own accounts and records
- To reply to your correspondence and/or requests
- To form a view on what we think you may want or need, or what may be of interest to you. This enables us to personalise and tailor our services to you as it is how we decide which services and offers may be relevant for you.
- To fundraise and promote the interests of the charity effectively. As a registered charity, we aim to fundraise as efficiently as possible, maximising the donations and grants we receive. Personal data is used to gain a better understanding of our supporters and audiences so that we can ensure that any funds have the optimum impact and are used appropriately to best support or charitable aims.
- With your permission and/or where permitted by law, we may also use your Personal Data to contact you with information, news and offers relating to our products or services by post, telephone or email. We will always obtain your opt-in consent for email marketing and include an unsubscribe link in marketing emails.
- Market research
- To provide products and services effectively (e.g. to supply workshop tutors with the information they need about participants in order to plan activity, deliver it in a way that is appropriate to the group, and/or to respond medical emergencies)
- To provide and manage access to our Site and online ticketing portal
- To analyse your use of our Site and to gather feedback to enable us to improve our Site and online user experience
- To keep our website, our services and associated systems operational and secure.
- To track issues that might be occurring on our systems.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will update this Privacy Policy and we will explain the legal basis which allows us to do so.

Our use of your Personal Data will always have a legal basis. Most commonly, we will rely on one of the following legal bases:

- Where it is necessary to form a contract we are about to enter into or have entered into with you (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”).
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the purpose in question (“**Consent**”).

Generally we do not rely on your Consent as a legal basis for using your Personal Data other than in the context of direct marketing communications sent via email.

### What Happens When You Do Not Provide Necessary Personal Data?

Where we *need* to process your Personal Data either to comply with law, or to perform the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. We will notify you if this is the case at the time.

### Personal Data from Third Party Sources

In addition to the Personal Data that we collect directly from you (as described above), we also collect some of your Personal Data from third party sources. These sources are broken down in the table below, together with a description of whether they are publicly available or not.

Third party data source	Publicly available?	Category(ies) or other types of personal data received.
Social Media sites	Yes	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>
Analytics Providers	No	<ul style="list-style-type: none"> <li>• Behavioural Data</li> <li>• Technical Data</li> </ul>

### Cookies & Other Tracking or Profiling Technologies

#### Cookies

When you use our Site we may collect information using “cookies”. Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of cookies:

- first party cookies, served directly by us to your computer or mobile device; and
- third party cookies, which are served by our partners or service providers on our Site or ticketing portal.

## Cookies we use

Our Site uses the following types of cookies for the purposes set out below:

Type of cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and through our online ticketing service provider's site to enable you to use some site features. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered via these cookies does not "directly" identify any individual visitor. However, it may render such visitors "indirectly identifiable". This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access our Site. The information collected is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies here: <a href="https://developers.google.com/analytics/resources/concepts/gaConceptsCookies">https://developers.google.com/analytics/resources/concepts/gaConceptsCookies</a></p> <p>You can find out more about how Google protects your data here: <a href="http://www.google.com/analytics/learn/privacy.html">www.google.com/analytics/learn/privacy.html</a>.]</p>
<i>Social Media Cookies</i>	These cookies are used when you share information using a social media sharing button or "like" button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Google+. The social network will record that you have done this.

## Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the "settings", "help" "tools" or "edit" facility). Many browsers are set to accept cookies until you change your settings.

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognise your computer or mobile device and you may need to log in every time you visit our Site.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com.uk](http://www.youronlinechoices.com.uk).

In particular, you can disable cookies which remember your browsing habits and target advertising at you by visiting <http://www.youronlinechoices.com/uk/your-ad-choices>. If you choose to remove targeted or advertising cookies, you will still see adverts but they may not be relevant to you. Even if you do choose to remove cookies by the companies listed at the above link, not all companies that serve online behavioural advertising are included in this list, and so you may still receive some cookies and tailored adverts from companies that are not listed.

You can also prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available via this link: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>

### **Who Do We Share Your Personal Data With?**

We are legally obliged to share certain data with public bodies, and will do so where the law requires this.

In order to provide our services to you, we may need to appoint other organisations to carry out some activities on our behalf. We will provide them with the information that is necessary in order for them to carry out these activities.

We select any organisations that act as service providers carefully and only share your information if we are confident that they will follow our instructions and treat your Personal Data in a manner that safeguards and assures your rights.

We will not sell your Personal Data to any third parties.

The table below describes who we share your Personal Data with, what we share and why we share it.

<b>Recipients</b>	<b>Category(ies) of Personal Data we share</b>	<b>Why we share it</b>	<b>Location(s)</b>
Service Providers	<ul style="list-style-type: none"><li>• Identity Data</li><li>• Contact Data</li><li>• Technical Data</li></ul>	Service providers have access to and/or process data on our behalf as part of the IT and system administration services they provide to us. Examples of our service providers include our online ticketing provider, payment processing organisations, our IT Support	<ul style="list-style-type: none"><li>• Within Europe</li><li>• The United States</li></ul>

		provider, mailing houses, and email marketing provider.	
HM Revenue & Customs, regulators and other authorities	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	In certain circumstances we may be required to disclose your personal information in order to comply with legal obligations (for example to government bodies and law enforcement agencies).	<ul style="list-style-type: none"> <li>• Within Europe</li> </ul>

### Data Transfers

As you can see from the above, we share your Personal Data with certain external third parties who are based outside the European Economic Area (“**Europe**”). Any processing of your Personal Data by these parties will involve an export of your Personal Data outside of Europe.

We endeavour to ensure that people to whom we provide Personal Data hold it subject to appropriate safeguards and controls. Whenever we transfer your Personal Data out of Europe, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. For further details, see [European Commission: Adequacy of the protection of Personal Data in non-EU countries](#).
- Where we use service providers based in the U.S., we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between Europe and the U.S. For further details, see [European Commission: EU-U.S. Privacy Shield](#).

### How Do We Keep Your Personal Data Secure?

Data Security is important to us and we have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We limit access to your Personal Data to those employees, volunteers and other staff who have a business need to have such access.

We have put in place procedures to deal with any actual or suspected Personal Data breach. In addition, in certain circumstances (e.g., where we are legally required to do so) we may notify you of breaches affecting your Personal Data.

### How Long Do We Store Your Personal Data?

We will only retain your Personal Data for so long as we reasonably need to use it for the purposes set out above, and/or as long as we have your permission to keep it unless a longer retention period is required by law (for example for regulatory purposes). Retention periods will vary according to the type of personal data and the reason that we have the

personal data. For example, some personal data related to the provision of services to you or by you will be kept for a number of years in order to comply with various finance and tax related legal obligations. Other service related personal data may be kept for a different period because it is in our legitimate interests to do so in order to provide or receive appropriate follow up service.

We have a detailed internal retention policy that sets out varying retention periods for different categories of personal data depending on our legal obligations and whether there is a commercial need. After a retention period has elapsed, the personal data is securely deleted.

### **Third Party Links**

Our Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your Personal Data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every site you visit.

### **Your Rights Relating to Your Personal Data**

By law you have the right to:

- **Request access to your Personal Data.** This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
- **Object to processing of your Personal Data.** This right exists where we are relying on a Legitimate Interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your Personal Data.** We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data (“**Consent Withdrawal**”). If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our Site. We will advise you if this is the case at the time you withdraw your consent.



## How to Exercise Your Rights

If you want to exercise any of the rights described above, please contact us by emailing [enquiries@number8.org](mailto:enquiries@number8.org) or calling our Box Office on 01386 555488.

Typically, you will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, except in relation to Consent Withdrawal, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Complaints

If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact us at: [enquiries@number8.org](mailto:enquiries@number8.org) or call Box Office on 01386 555488. We will reply to your complaint as soon as we can.

If you feel that your complaint has not been adequately resolved, please note that the GDPR gives you the right to contact your local data protection supervisory authority, which for the UK, is the [Information Commissioner's Office](#).

## Marketing Communications Preferences

You can ask us to stop sending you marketing messages at any time by:

- contacting or visiting our Box Office on 01386 555488, Number 8, 8 High Street, Pershore, WR10 1BG
- emailing [enquiries@number8.org](mailto:enquiries@number8.org)
- checking or unchecking relevant boxes to adjust your marketing preferences on our sign up form on our Site or as part of the online ticket purchase process
- following the unsubscribe links on any marketing message sent to you

Where you opt out of receiving these marketing messages, this will not apply to Personal Data used for communications that are related to purchases, subscriptions or participation in activities which are necessary in order to process sales, administer subscriptions or organise participatory activities.

## Number 8 Ltd, May 2018