

## Privacy and Data Protection

### Purpose

NoFit State Circus is committed to protecting your privacy. We will use the information that we collect about you in accordance with the General Data Protection Regulation (GDPR) May 2018.

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Registered Charity Number 1102850  
Registered Company Number 3180348

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## Who We Are

NoFit State Circus is a company limited by guarantee and a registered charity. We receive funding, for example from the Arts Council of Wales and Arts Council England, and the rest of our income is generated through ticket sales, performance and attendance fees, (although a high proportion of our artistic programme is free), commercial partnerships, sponsorship, private fundraising, secondary trading income and individual donations.

## What Information Do We Collect?

### Trustees

The personal information we collect includes:

- Name, date of birth, gender
- Contact details (including postal address, email, phone numbers) and In Case of Emergency (ICE) contact details
- Details of any other directorships held (both past and current), related parties
- Information about race, ethnicity and sexual orientation, ability / disability, medical needs for monitoring purposes

### People Who Work and Volunteer With Us

The personal information that we collect includes:

- Name, date of birth, gender

- Contact details (including postal address, email, phone numbers) and ICE contact details
- National Insurance number, passport and driving license details, personal bank account details, proof of right to work in the UK (where appropriate)
- Medical information
- Information about race, ethnicity and sexual orientation, ability / disability for monitoring purposes (you have the right to decline to provide us with this information)

## **People Who Attend Classes in Four Elms**

The personal information that we collect includes:

- Name, date of birth, gender
- Contact details (including postal address, email, phone numbers) and ICE contact details
- Transaction history (we never store your card number)
- Access requirements and whether you have a disability defined by the Equality Act 2010
- Medical information
- Details of visits to our website including traffic data, location data, operating system, browser usage, and the resources that you access
- Image and likeness (as captured in photographs and videos we use for promotional purposes)
- Other background personal information you provide to us (for example when you tell us your story, provide a reason for making a donation or correspond with us).
- Information about race, ethnicity and sexual orientation, ability / disability, (you have the right to decline to provide us with this information)

## **People Who Buy Tickets for Performances**

The personal information that we collect includes:

- Name, date of birth, gender
- Contact details (including postal address, email, phone numbers)

- Transaction history (we never store your card number)
- Access requirements and whether you have a disability defined by the Equality Act 2010
- Medical information (where volunteered)
- Details of visits to our website including traffic data, location data, operating system, browser usage, and the resources that you access
- Image and likeness (as captured in photographs and videos we use for promotional purposes)
- Other background personal information you provide to us (for example when you tell us your story, provide a reason for making a donation or correspond with us).
- Information about race, ethnicity and sexual orientation, ability / disability, (you have the right to decline to provide us with this information)

## **CCTV Footage**

There is CCTV footage being recorded at NoFit State's sites at Four Elms and Llandow. These cameras cover a wide area, including monitoring entries, exits and buildings. People accessing the site will be made aware that they may be being recorded through the use of signage indicating the presence of the cameras.

## **Why Do We Use CCTV?**

CCTV is necessary in order to ensure the security of the site. NoFit State uses CCTV to monitor entries and exits as well as to provide security to buildings. The cameras have been installed as a deterrent against crime.

## **How Is This Data Stored?**

All CCTV footage is stored securely either in the cloud on a local hard drive which is kept on site. The footage is password protected.

Access to the CCTV is controlled and limited to those that require access to it to do their job. We may share the data when required in order to comply with any legal obligation to do so. This includes the police and other crime protection and detection agencies.

### **How Long Do We Keep CCTV Footage?**

The footage is only kept for a limited amount of time, as it overwrites automatically when the disk is full.

### **How Do We Collect Your Information?**

You give us your information when you buy a ticket, make a purchase from our shop, buy something online, sign up for one of our events, update your preferences on our website, tell us your story, make a donation, apply for a job, become a Trustee or communicate with us. We also keep your details when you sign up to receive emails and newsletters from us.

We keep a record of the emails we send, and we may track whether you receive or open them so we can make sure we are sending you the most relevant information. We may then track any subsequent actions online, such as buying a ticket.

Like most websites, we receive and store certain details whenever you use the NoFit State website. We use “cookies” to help us make our site – and the way you might use it – better. Cookies mean that a website will remember you and enable online transactions. It also helps us understand how you use our website, where we can make improvements and how best to tell our audiences about events they might be interested in.

We may also obtain personal information about you from other sources, such as if a family member or friend contacts us on your behalf. Where this occurs and it is not practical for us to provide you directly with a copy of our privacy policy, we may ask the person who provided us with your information to make this privacy policy available to you.

We may collect video footage of you through CCTV.

We may also receive information from external sources which enables us to gain a better understanding of our audiences, visitors and supporters and to improve our fundraising and marketing methods. These sources include:

### **Third Party Organisations**

Your information may be shared with us by independent fundraising sites like JustGiving or Virgin Money Giving if you make a donation to NoFit State, but only when you have indicated that you give your consent to hear from us. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

## **Social Media**

We use social media to broadcast messages and updates about events and news. On occasion we may reply to comments or questions you make to us on social media platforms. You may also see adverts from us on social media that are tailored to your interests.

Depending on your settings and the privacy policies used by social media and messaging services like Facebook, LinkedIn or Twitter, we may receive non-personally identifying demographic or analytical information from these services that enables us to better understand the reach and effectiveness of our advertising.

## **Information Available Publicly**

This may include information found in places such as Companies House, your biography on your work website, or information that has been published in articles/newspapers.

## **How We Keep Your Details Safe and Secure**

Your personal data will be held and processed on NoFit State Circus' systems or systems managed by suppliers on behalf of NoFit State Circus. We maintain a customer relationship management (CRM) system to hold contact details and a record of your interactions with us such as ticket purchases, donations, memberships, queries, complaints and attendance at special events. Where possible we aim to keep a single record for each customer.

We always seek to hold your data securely.

Access to customer information is strictly controlled. The CRM system can only be accessed by people who need it to do their job. Certain data, for example sensitive information, is additionally controlled and is only made visible to members of staff who have a reason to work with it.

## **Our Basis for Processing Your Personal Information and What We Use It For**

We aim to be clear when we collect your data and not to do anything you wouldn't reasonably expect.

We may process your personal data because it is necessary for the performance of a contract. For example, if you make a purchase, sign up for an event or give a donation.

We may process personal data because it is in our legitimate interests to do so. For example we may use your personal information to understand your reasons for donating to us, to better understand your interests, to carry out screening on potential donors and to conduct due diligence on major donors, to tailor our communications to you and/or to give you an exceptional experience at our events. We may also collect information about how you use our services (including our website) to analyse our customer base and improve our processes. NoFit State also records and uses film, photographs and audio for promotional purposes on its website, social media accounts and other formats under its legitimate interests basis for processing where it would not be necessary, appropriate or practicable to obtain your specific consent (for example, we may seek specific consent for prominent or impactful uses, but typically not for group shots, background inclusion or internal use).

We may also process your personal data (including sensitive personal data) where:

- it is necessary for medical purposes (for example, in a medical emergency)
- it is necessary to protect your or another person's vital interests
- we have your consent to do so (for example to monitor the diversity of class attenders). We will also ask for your consent to provide you with information about products and services and fundraising activities which may be of interest to you (apart from where it is appropriate for us to rely on our legitimate interests to do so).

## **Giving You Control**

We may tell you about events, classes, performances, work opportunities, priority booking and information about our premises (for example when our building will be closed over the summer). We make it easy for you to tell us how you want to hear from us. You can opt out from these marketing communications at any time - every email sent to you will tell you how to do this.

If you have opted out of marketing communications, we may still get in touch with you. For example, we may email you to give you important information about the events you've booked or to tell you about any changes.

## **NoFit State as a Charity and How We Respect Our Donors**

We rely on charitable support to maintain our world-class programme and to make this available to everyone.

You can opt in to receive information about supporting us by logging in to our website, by subscribing to our fundraising mailing lists, or by contacting a member of our Development Team directly. We will tell you about our current campaigns that we

think are most relevant to you, ways that you can make a real difference and invitations to events where you and your family can get closer to our artistic programme and meet members of the company.

## Third Parties

We may need to disclose your details:

- If we run an event in partnership with another named organisation so that they can help us run the event
- In order to comply with any legal obligation to do so. This includes the police and other crime protection and detection agencies or regulatory bodies
- To our legal advisors
- For the purposes of regulatory or inspection compliance, for example to the Charity Commission
- To funding bodies, particularly the Arts Council of Wales or Arts Council England, who may use anonymised personal information to analyse our audience development programmes, ticket sales and self-generated funding to understand the impact of the public investment made in the arts
- Data processing services acting in an accordance with our instructions, and subject to confidentiality obligations

## How Long Do We Keep Your Information?

We may retain information for a period of six years after your association with us has come to an end. Some information may be retained indefinitely for historical, statistical or research purposes. As stated below, you have the right to require us to erase personal data.

## Your Rights

Under previous data protection legislation you had the following rights:

- to obtain access to, and copies of, the personal data that we hold about you
- to require that we cease processing your personal data if the processing is causing you damage or distress
- to require us not to send you marketing or fundraising communications

From 25 May 2018 and the introduction of GDPR, you will also have the following additional rights:

- to require us to correct the personal data we hold about you if it is incorrect
- to require us to erase your personal data
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

## Contact Us

All our newsletters and e-fliers have an unsubscribe button. If you would like to be removed from our mailing lists, please click the button and you will automatically and immediately be removed from that mailing list.

If you:

- would like a copy of the data we hold about you
- would like us to correct the data we hold about you
- would like us to change or restrict how we process your data
- would like us to erase your data from our system

Or if you have any questions about our privacy policy or information we hold about you, please contact the Company Administrator, 02920 221 330.

Re: Data Protection, NoFit State, Four Elms, Four Elms Road, Cardiff. CF24 1LE

The Company Administrator will reply to you within one month.