



Privacy Notice

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the Data Protection Act 2018, the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

We protect data according to the key data principles:

- Processing of personal data for any of the law enforcement purposes must be lawful and fair.
- The law enforcement purpose for which personal data is collected on any occasion must be specified, explicit and legitimate, and; Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.
- Personal data processed for any of the law enforcement purposes must be adequate, relevant and not excessive in relation to the purpose for which it is processed.
- Personal data processed for any of the law enforcement purposes must be accurate and, where necessary, kept up to date, and; Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the law enforcement purpose for which it is processed, is erased or rectified without delay.
- Personal data processed for any of the law enforcement purposes must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data for any of the law enforcement purposes.
- Personal data processed for any of the law enforcement purposes must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, “appropriate security” includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Who are we?

This Privacy Notice is provided to you by Response Ability Theatre, a Charitable Company Limited by Guarantee, charity number 1206912. References to “we” and “our” in this Notice are references to Response Ability Theatre.

What data do we process?

We will process some or all of the following where necessary to perform our tasks:

- Names, titles and aliases, photographs;
- Contact details such as telephone numbers, addresses and email addresses;
- Where they are relevant to our mission, or where you provide them to us, we may process demographic information of trustees, staff, individual donors, volunteers and beneficiaries such as gender, age, date of birth, marital status, nationality, ethnicity, disability status, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Also where relevant to our mission, or where you provide them to us, the data we process relating to trustees, staff, individual donors, volunteers and beneficiaries



may constitute special category data (previously known as sensitive personal data) and/or criminal offence data.

How do we process your personal data?

We will comply with legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- To enable us to meet all legal and statutory obligations;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all our beneficiaries, staff, volunteers and all others involved with Response Ability Theatre are provided with safe environments;
- To fundraise and promote the interests of Response Ability Theatre;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our activities, events and role holders as deemed appropriate;
- To send you communications which you have requested and that may be of interest to you. These may include information about our charitable activities and our campaigns, appeals and other fundraising activities; and
- To process a grant or application for a role.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests. We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. Some of our processing may from time to time be necessary to comply with a legal obligation. Where your information is used other than in accordance with one of the above legal bases (legitimate interests, contractual obligation and/or legal compliance) we will first obtain your consent to that use.

Special category data and criminal offence data

Where we process special category data or criminal offence data we will obtain your explicit consent.

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the delivery of our mission or where you first give us your prior consent. However, we will always obtain your prior consent before sharing any special category data and/or criminal offence data with a third party.

It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Public and private bodies with which we have entered/or propose to enter into arrangements to assist us in delivering our mission. For example, we may share your data with other theatre companies and groups; various vocational and educational bodies; and bodies that assist us in delivering the Response Ability Theatre outreach programmes;
- Our agents and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software; and
- The Charity Commission for England and Wales, Her Majesty's Revenue and Customs

("HMRC") and other regulatory or statutory bodies.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data.

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.

- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

2. The right to correct and update the information we hold on you

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

4. The right to object to processing of your data

- You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

5. The right to data portability

- You have the right to request that we transfer some of your data to another Data Controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.

- You can withdraw your consent easily by e-mail (see address below).

7. The right to object to the processing of personal data where applicable.

8. The right to lodge a complaint with the Information Commissioner's Office ("ICO").

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for



example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on our website.

This Notice was last updated in July 2024.

Please contact us if you have any questions about this Privacy Notice, or the information we hold about you, or to exercise all relevant rights, queries or complaints at:

info@responseabilitytheatre.com

If you wish to register a complaint without a member of staff seeing it, please send it to:

trustees@responseabilitytheatre.com

You can contact the ICO on 0303 123 1113 or via email

<https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.