

PRIVACY POLICY

Please read the full details of our Privacy Policy.

Fleur de Lis Classical Theatre Company Ltd ("we") are committed to protecting and respecting your privacy in accordance with the Data Protection Act 2018 (DPA 2018), UK General Data Protection Regulation (UK GDPR) and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

The purpose of this policy is to set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please revisit this document on a regular basis to see any updates or changes to our privacy policy.

WHO WE ARE

Fleur de Lis Classical Theatre Company Ltd (FDL) is a private limited company incorporated January 27th 2021 (Company number **13163260**).

Our principal objectives are to conserve, advance and disseminate the literary heritage and historical events of various cultures and individuals across all of human history, through the medium of live theatre, and to advance and improve the dramatic art, both in the United Kingdom and throughout the world. We are charged with producing and presenting dramatic performances of all kinds, and with teaching and training and other educational activities. These objectives are achieved by the production of plays by classic playwrights and by the commissioning and production of new plays set in classical times, which are presented in various theatres across the UK and on tour; and by educational activities in schools, colleges and for the community at large.

Our purpose is to create a unique experience in which classical era shows are staged and performed with advanced, visually spectacular, physical skills including: stage combat, puppetry, stunts and physical theatre and shared with the widest audience possible across the UK and eventually around the world.

By visiting www.fleurdelistheatre.co.uk you are accepting and consenting to the practices described in this policy.

For the purpose of the UK GDPR the data controller is Fleur de Lis Classical Theatre Company Ltd (ICO reference **ZB098503**).

CONTACT US

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@fleurdelistheatre.co.uk.

WHAT INFORMATION DO WE COLLECT?

We only collect the information that is necessary to carry out normal business operations, to provide any goods or services you've asked for, and to keep you updated about our current and future activities. Examples of the type of personal information that we collect includes:

- name, title, date of birth and gender identity
- contact details including email, phone numbers
- if you are a teacher with whom we have professional relationship, name and address of school/college, type of school/college, teacher name, teacher email, subject and key stage taught
- transaction history, including financial and credit card information
- access requirements to enable us to determine if you require wheelchair access, audio description, BSL interpretation, or any other access requirement
- image and likeness (as captured in photographs and videos we may use for promotional purposes)
- technical information gathered when you visit our website; including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit to our website; including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our contact number.
- other background personal information you may provide to us (for example when you correspond with us).

HOW DO WE COLLECT YOUR INFORMATION?

You give us your information when you:

- buy a ticket, make a purchase from our shop, or buy something online
- sign up to receive marketing communications from us
- sign up for one of our events or workshops
- make a donation
- apply for a job
- enter a competition, promotion or survey
- communicate with us by phone, email or otherwise.

We also keep your details when you sign up to receive marketing communications from us.

WHAT WE USE YOUR PERSONAL INFORMATION FOR

We will only collect the personal data that we need and use it for relevant lawful purposes as permitted by the current data protection legislation (UK GDPR, DPA 2018, and PECR).

WE WILL USE THIS INFORMATION:

- to carry out our obligations arising from any contracts between us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means if you have consented to this. You can quickly and easily make changes to your contact information, how you'd like to hear from us, and what you'd like to be kept up-to-date about by contacting us via info@fleurdelistheatre.co.uk.
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your device.
- to send you invitations to take part in research surveys, research discussion groups or interviews to give your opinions about our productions and services (whether or not you have agreed to receive other communications) to conduct desktop research and fundraising activities to promote the interests of Fleur de Lis Classical Theatre Company outreach projects and performances;
- to ensure that our fundraising resources are used in the most effective and efficient manner and that any communications we may send you about fundraising are appropriate.
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;
- to ensure that our fundraising resources are used in the most effective and efficient manner and that any communications we may send you about fundraising are appropriate.

INFORMATION WE RECEIVE FROM OTHER SOURCES

We may combine this information with information you give to us and information we collect about you. To make sure you only receive fundraising communications which are relevant, we may undertake research to help us better understand our supporters and to contact appropriate people who may be able to support us further. In doing so we will make use of additional publicly-available information about you.

As part of our fundraising, we may seek to supplement booking information with qualified information such as business network information, personal connections and other publicly-available information pertaining to: age, place of residence, wealth, career, interests and public donations to other organisations.

We achieve this by using resources to assist us in our fundraising, including the Internet for general searches, newspaper articles, the electoral roll, property and housing marketing websites, official company websites, and those of charities and other arts organisations.

We may use publicly-sourced images to help identify individuals who attend our fundraising events.

We make every endeavour to ensure the information we hold about you is accurate and therefore may use publicly available information to keep the database accurate and relevant.

USE OF SENSITIVE PERSONAL DATA

Some of the information that you give us, due to its nature, has more potential to cause harm if not handled correctly.

The UK GDPR recognises that certain categories of personal information are more sensitive. These are known as "Special Category Data".

Such information shall only be collected after having obtained your explicit consent. We sometimes request sensitive personal data in our customer surveys, in order to assist us with our diversity monitoring, which we are required to report on as part of our funding. This data is not obligatory to provide, is analysed anonymously, and not linked to individual customer records.

Special category data we may collect about you include: racial and ethnic origin, political beliefs, religious or philosophical beliefs, trade union membership, health, and sexual orientation.

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 book an education workshop.

We may process personal data because it is in our legitimate interests to do so. Examples of these may be:

- to share information about our organisation or invite to stakeholder events with representatives from government; individuals within other arts organisations; and other interested parties
- we may use your personal information to understand your reasons for donating to us, to better understand your interests,

- to tailor our communications to you and/or to give you the best 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.
- The FDL also records and uses film, photographs and audio for promotional purposes on its website, social media accounts and other formats under a 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 our visitors to the FDL).

We will also ask for your consent to provide you with information about productions, offers, and other services which may be of interest to you (apart from where it is appropriate for us to rely on our legitimate interests to do so). Other activities relate to tours, events, exhibitions, education work, fundraising, as well as our shops.

GIVING YOU CONTROL

- We try to make it as easy as possible for you to tell us how you want to hear from us (by logging onto our website) or by telling us over the phone or in person. You can opt out of these marketing communications at any time.
- 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.
- Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.
- We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you, including geo-demographic information and measures of affluence when it is available from external sources to help us do this effectively. This helps us understand the background of the people who support us and helps us to make appropriate requests for gifts to supporters who may be able and willing to give more than

they already do. We may also use your personal information to detect and reduce fraud and credit risk.

SHARING YOUR PERSONAL INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will not share any personal details with any other third parties without your agreement, unless required in order to fulfil our contract with you, or allowed by law.

Instances where we may share your personal information with selected third parties include:

- Business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you. In general, the third-party providers used by us to fulfil our contract with you will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. These providers include our ticketing and events systems provider, and our email and mail distribution services. We have agreements in place with each to ensure that your data is secure at all times, and cannot be accessed or used for any other purpose.
- Social media sites for the purposes of data analytics and targeted advertising.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Fleur de Lis Classical Theatre Company Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Fleur de Lis Classical Theatre Company Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- Please note that Sensitive Personal Data will not be shared with third parties without your consent.

WHERE WE STORE YOUR PERSONAL DATA

- Your personal data will be securely held and processed on FDL's systems or systems managed by suppliers on behalf of FDL. We maintain a customer relationship management (CRM) system to manage our activities in ticketing, marketing, relationship management of our customers, and fundraising to hold contact details and a record of your interactions with us such as ticket purchases, donations, queries, complaints and attendance at special events.
- 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.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG DO WE KEEP YOUR DATA?

- We will keep your information only for as long as is reasonably necessary for the purposes set out in this Privacy Policy and to fulfil our legal obligations. We will not keep more information than we need. When we no longer require the information, it will be securely destroyed.
 - The retention period will vary according to the purpose, for example for a financial transaction such as a ticket purchase, we may keep your data for up to seven years from the date of your last transaction to comply with HMRC requirements.
- To request specific information about how long we keep your personal data please email info@fleurdelistheatre.co.uk.

YOUR RIGHTS

Under data protection law, you have the following rights:

- Your right of access - You have the right to ask us for copies of your personal information.
 - Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
 - Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
 - Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
 - Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.
 - Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to exercise any of the rights set out above, please contact us using the contact details found at the beginning of the policy.

This privacy policy was updated in November 2023.