



Glyndwr Ensemble

PRIVACY POLICY

The Glyndwr Ensemble are committed to protecting your privacy. We will use the information that we collect about you in accordance with, the Privacy and Electronic Communications Regulations 2003, the Data Protection Act 1998 (DPA) and any replacement laws, and, since May 2018, the General Data Protection Regulation (GDPR).

Who we are:

The Glyndwr Ensemble is an arts organisation, a charitable incorporated organisation and a registered charity (No. 1190670).

What information do we collect?

The personal information that we may collect includes:

- name, title, date of birth and gender
- contact details including postal address, email, phone numbers and links to social media accounts
- transaction history (we never store your whole card number, although we may keep a note of the last four digits to help us identify transactions)
- access requirements (for example if you require wheelchair access) and whether you have a disability defined by the Equality Act 2010
- details of visits to our website including traffic data, location data, operating system, browser usage, and the resources that you access
- other background personal information you provide to us (for example when you apply for a job, tell us your story, provide a reason for making a donation or correspond with us).

How do we collect your information?

You give us your information when you buy a ticket, buy something online (e.g. CDs, downloads etc), sign up for one of our events, update your preferences on our website, make a donation, apply for a job, or communicate with us. We also keep your details when you sign up to receive emails including newsletters from us.

We keep a record of the emails and newsletters we send you, 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 Glyndwr Ensemble 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 event's they might be interested in.

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

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, etc.

How we keep your details safe and secure

Your personal data will be held and processed on The Glyndwr Ensemble's systems or systems managed by suppliers on our behalf.

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.

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 have their own Privacy Policies and should be referred to if required.

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. The Glyndwr Ensemble also records and uses film, photographs and audio for promotional purposes on its website, social media accounts and other formats under its legitimate interest's 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 interests
- we have your consent to do so (for example to monitor the diversity of visitors to our events).

Giving you control

We may tell you about events, concerts, shop offers and priority booking options. You can opt out from these marketing communications at any time – every email sent to you will tell you how to do this or send us an email at paul@glyndwrensemble.com requesting your opt out from our marketing communication.

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

Receiving fundraising communications

The Glyndwr Ensemble relies on charitable support to maintain our activities and to make this available to everyone. We will occasionally tell you about our current campaigns and invite you to consider ways that you could make a real difference to our work.

We invite some people who might be interested in joining one of our membership groups to special events e.g. drinks receptions or rehearsals or to tell you about extra benefits including priority booking. Guests we invite might include current supporters, Sponsors, Patrons, Friends of, Partners and people who have given donations in the past and audience members who attend concerts and events regularly.

Disclosure to 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 Councils, who may use anonymised personal information to analyse our audience development programmes, ticket sales and self-generated funding to understand the impact of their investment made in us.
- Data processing services acting in an accordance with our instructions, and subject to confidentiality obligations

We do not sell personal details to third parties for any purpose nor will we share your personal data with any other organisations or promoters.

How long do we keep your information?

The personal data collected by The Glyndwr Ensemble is evaluated periodically to determine whether it is current and still needs to be held.

Data is held by us for as long as is legally or practically necessary for our business. Once that period of necessity has passed, we have a regular programme of data suppression and deletion. This ensures that your data is not held indefinitely on our systems.

Subject to any legal retention requirements (e.g. VAT regulations require appropriate financial records to be retained for six years, Gift Aid regulations require appropriate records to be retained for seven years), you may notify us if you do not wish your data to be held.

Your rights

Under the DPA you have 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 communications

You 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:

Please contact us if you have any questions about our privacy policy or what information we hold about you: email us at paul@glyndwrensemble.com

Supporters, Sponsors, Patrons, Partners, Friends of and Donors

What data do we process?

We will process your personal data only for specified purposes in order to provide you with a more efficient and personalised service. We collect the following data:

Names, address, phone number or email address.

This information, provided by you, enables us to contact you about our events and activities, which in turn allows you to show interest in or support such activities.

Information regarding your relationship with The Glyndwr Ensemble

This includes events you have attended, donations you have made and communications you have had with us.

Details of any donation you have made to The Glyndwr Ensemble

This includes how it was received, date of receipt and whether we have claimed Gift Aid.

Information regarding your personal preferences

This information is your philanthropic history obtained through publicly available sources.

What do we use your data for?

- To fulfil our obligations to supporters in terms of acknowledgement of their gift and agreed stewardship activities
- To administer donations or other payments (concert tickets etc)
- To keep you updated with activities of The Glyndwr Ensemble, to offer you opportunities to engage further with our activities
- To administrate Gift Aid claims
- To prepare for events that you attend. We will compile event briefing notes for our team including information about your relationship with us and your philanthropic interests. This information is kept strictly confidential.

How do we store your data?

Your data is kept on an encrypted server on our password protected database only available to us and our database service provider via a login.

Any personal data on hard copy is stored in locked cupboards. We also store bank and other payment details in secure systems.

What is the lawful basis for processing your data?

Current and former supporters

We rely on legitimate interest and fulfilment of contract when processing information relating to current supporters and recent former supporters.

New or prospective supporters

For new or prospective supporters we will rely on an individual's consent.

How long do we retain your data?

The personal data we collect are evaluated annually to determine whether they are current and still need to be held. There may be legal requirements for us to retain your data – e.g. tax regulations and the Charities Act 2011.

How to opt out

In accordance with Data Protection Law, you have a choice about whether you want to receive information about our fundraising activities and by which channels (e.g. telephone, email, post). Every effort will be made to contact you using your preferred contact method and to limit the frequency of non-personalised communications. You may opt out from receiving correspondence at any time by emailing paul@glyndwrensemble.com, or calling 07730 585067.

General Administration: Trustees, support team, musicians and contractors

We collect information about our trustees, support team, musicians and contractors (e.g. agents, promoters, suppliers) for administrative and management purposes only. We retain and process it so that we can run our organisation and manage our relationship with you effectively, lawfully and appropriately. We must also process your personal data in order to comply with contractual and legal obligations, pursue the legitimate interests of our organisation, and protect our legal position in the event of legal proceedings. If you do not supply us with this data, we may be unable in some circumstances to comply with our obligations. If this is the case, we will tell you about the implications of that decision.

What data do we process and what do we use it for?

There are a number of areas of activity where we process data for our support team, musicians and contractors. In some instances, we collect all or some of the following for general administrative purposes:

- Company name (where relevant)
- Email address
- Postal address
- Telephone number(s)
- Bank details (for payment only)
- Instrument played (where relevant)
- Date of birth
- National insurance number
- Tax/VAT number
- Tax residence and status
- Nationality

For the administration of touring and logistics we collect:

- Passport details
- Previous travel history
- Marital status
- Names and details of family members
- Dietary requirements
- Relevant medical details
- Biographical profile information
- Photographs / film material

For on-going administration, we keep a history of previous interactions, for example correspondence about fee agreements, project-related information etc, emergency contact details and references created at your requests for mortgage, employment or other purposes.

Your data is processed by us to support the activity for which you have been engaged. We will only store and process your data when it is necessary to do so in order to support the activity for which you have been engaged.

For personnel administration we collate:

- Contracts (including all personal data contained in them)
- Right to work documents
- Information needed for equal opportunities monitoring policy
- Personnel-related information, for example appraisals.

For governance we collect:

Information about trustees (e.g. name, address, contact details etc)

This information is collected in order to comply with submissions with external authorities, for example Companies House, the Charity Commission, auditors and banks.

We will only store and process your data when it is necessary to do so in order to support the activity for which you have been engaged by us and we will never process your data where these interests are overridden by your own interests.

How we store your data

Your data is kept on an encrypted server on our password protected database only available to us and our database service provider via a login.

Any personal data on hard copy is stored in locked cupboards. We also store bank and other payment details in secure systems.

What is the lawful basis for processing your data?

Contract

Whenever you are engaged professionally with us, you enter into a contract with us be it written or verbal. In order to fulfil this contract, we need to store and process your data.

Legitimate interest

We have a legitimate interest as an organisation in processing other data that help us effectively carry out our business – e.g. previous correspondence and project data for future touring. In all such cases we balance interests carefully and ensure there is no overriding prejudice to you by using your personal information in this way.

Consent

In such an event that the above lawful bases are not sufficient, we would ask for your consent. We only share your data with third-party organisations in a manner that is in your interests, that you would reasonably anticipate and that is necessary to support your professional engagement with us.

Legal

We are legally required to share personal data relating to work of The Glyndwr Ensemble with auditors and HRMC etc.

How long do we retain your data?

We are required to keep financial records for up to seven years. Passport and previous visa information are retained for no more than ten years. This is a requirement in some visa processing.

Where an artist has worked with us, we may need to retain contact and payment details in order to make royalty payments. We also retain contracts, schedules, programmes and related biographical information, including audio-visual media on an indefinite basis.

How do you opt out?

You are entitled to object to us processing your personal data for any or all of the purposes set out in this privacy notice and may do so at any time. If you wish to do so, please contact

paul@glyndwrensemble.com giving clear details of the processing and/or personal data to which your objection relates. Please note that if you do decide to opt out in this way, we may not be able to comply with our obligations and we will inform you of the possible implications of that decision.

What are your rights?

You have the right to:

- Request a copy of the information we hold about you
- Update or amend any incorrect information we hold about you
- Ask us to stop processing your personal data and/or to remove it from our records

- Raise a concern about how your information is being used
- Make a complaint using our Complaints Policy procedure
- Lodge a complaint relating to the use of your personal data with the Information Commissioner's Office

We will update this privacy policy as and when appropriate. Please check for updates. Last updated December 2020.