

GATE THEATRE PRIVACY POLICY

Correct at 18.7.18



The Gate Theatre is dedicated to protecting the privacy of those who use our services. We are the data controller for your personal data and will ensure it is used and stored in accordance with the Data Protection Act (1998), the Privacy and Electronic Communication Regulations (2003) and as of the 25th of May 2018, the EU General Data Protection Regulation (EU 2016/679).

The Gate Theatre Company Ltd is a registered charity (number 280278) and a company limited by guarantee (01495543) registered in England and Wales.

Who Are We?

The Gate Theatre is a 75-seat theatre above the Prince Albert pub in Notting Hill. We have been presenting ground-breaking international plays to a London audience since 1979.

We want to maintain the trust and confidence of our audience, participants and supporters, as well as visitors to our website, by ensuring that you fully understand the way that we use your data.

Our Privacy Policy gives you detailed information on when and why we collect your personal information, how we use it, how we keep it secure and how long we keep it for. It also explains how you can control the data we hold, including how to update your information when it changes.

Any information you provide us with helps us to deliver a more personalised experience and smoother ticket buying process.

Contact info

By post: Data Team, Gate Theatre office, 12 Pembridge Road, London, W11 3HL

By email: data@gatetheatre.co.uk

By phone: +44 (0) 207 229 5387

How do we collect your personal information?

When you engage with us as an audience member, supporter, donor or as part of our programme of talks and workshops, we collect your information. This could be when you purchase a ticket or become a supporter, make a donation, sign up to a workshop or talk, sign up to our mailing list, or register on our website. These interactions may occur online, in person or over the phone.

We may also collect information from publicly-available sources as part of our fundraising practice; for fuller information, see "Prospect Research" below. This may include obtaining information from individuals working on our behalf such as our Board or Development Working Group.

1. When you create an account on our website at www.gatetheatre.co.uk, your account allows you to do the following:

- Purchase tickets
- Become a supporter
- Make a donation
- Sign up to our mailing list
- Update your customer communication preferences

2. When you interact with us in person to:

- Purchase tickets
- Join as a supporter
- Make a donation
- Attend a fundraising event
- Attend a workshop or talk
- Sign up to take part in an Open Gate project
- Sign up to our mailing list
- Give us your access requirements
- Give feedback

3. When you contact us by phone to:

- Purchase tickets
- Join as a supporter
- Make a donation
- Attend a fundraising event
- Attend a workshop or talk
- Sign up to take part in an Open Gate project
- Sign up to our mailing list
- Give us your access requirements
- Give us your dietary requirements for fundraising events
- Give feedback

4. When you contact us via post

- Join as a supporter
- Attend a fundraising event
- Attend a workshop or talk
- Sign up to take part in an Open Gate project
- Give feedback

5. When you email us with any information relevant to your booking, including the

- Access requirements
- Dietary requirements for fundraising events
- Give feedback

6. When you visit our website:

- Through your IP address given to us by your browser
- Through cookies - see our Cookie Policy at <https://www.gatetheatre.co.uk/cookie-policy>

7. Via Social Media

We may collect some personal data (name, address, phone number, booking details) when you enter competitions or give us booking details for customer support through social media. We also collect and track anonymised data on our social media audiences to better understand the 'groups'

of people who engage with us online. We use this to ensure we engage with audiences and groups of people who are new to us.

8. Via publicly available information such

- Google
- Companies House Charities Commission
- Donor boards of other relevant arts organisations
- Information published in articles / newspapers

We may collect any of this information from a person working on your behalf, such as a personal assistant, with your consent.

9. Via filming and photography in our public spaces

We will always put up notices when filming or taking photographs and give individuals the option to not be captured.

What types of information do we collect and where from?

We only collect information that's necessary to carry out our business or to deliver our charitable objectives. The more ways you engage with us as an organisation, the more data we will require in order to provide the necessary services required. There are occasions where you can choose to not provide us with the information we require, but this will then impact the service we are able to provide.

The information we may collect from you is as follows:

- Prefix and full name
- Gender
- Email address
- Billing address
- Phone number
- Date of birth
- Payment card details - please note we do not save these details and therefore only retain the last four digits of your card in our database
- Delivery address
- Bank details for Direct Debit instructions
- Bank details for Standing Order instructions – please note these are sent to your bank and are not retained by the Gate
- Access requirements
- Dietary requirements (for fundraising and press events only)
- Contact preferences
- Emergency contact details (for project participants only)
- Borough (for project participants only)
- Job information
- Imagery (photography and video)

This is not an exhaustive list and we may retain different types of information for different individuals based on the service we are providing. For information on how long we retain your data for, refer to the 'how we protect data' section of this policy.

We also keep a record of your interactions with us in our database, such as what shows you have purchased tickets to, when you have had an active membership, any events or projects you may have participated in or supported and whether you have received, opened or clicked through any emails we may have sent.

We also may collect an automatically populated IP address when you use our website or email service. This public IP address is a unique number which allows a computer, group of computers or other internet connected device to browse the internet. The log file records the time and date of your visit, the pages that were requested, the referring website (if provided) and your internet browser version. This information is collected to help diagnose and manage the website, to audit the geographical make-up of users, and to establish how they have arrived at the website.

We do use cookies which retain information about your online behaviour, preferences and settings. For more information, please refer to our cookie policy.

Third Parties

We may also obtain your data from third parties, such as organisations with which we enter into a co-production. These organisations should not pass on your data to us without your knowledge and only if it is required in the performance of a contract. The third party will require your permission in order to share your data with us for marketing purposes and we will always notify you within 30 days of receipt of your data. You should check their Privacy Policy when you provide your information to understand fully how they will process and safeguard your data.

Social Media

Depending on your settings or the privacy policies for social media services like Facebook, Instagram or Twitter, you may give us permission to access information from those accounts or services, such as your behaviour on these services and across our site. The majority of this behaviour is anonymised. For more information on how to control your privacy settings for these services, go to the following links:

Facebook - [Privacy Policy](#)

Twitter - [Privacy Policy](#)

Instagram – [Privacy Policy](#)

YouTube - [Privacy Policy](#)

Information Available Publicly

We may collect information such as job history, trusteeship, locality and philanthropic activities from places such as Companies House, Google, 192.com, and information that has been published in articles / newspapers.

Why do we collect your personal information and how do we use it?

The main way we use your information is to provide the services you've requested. We also use your information to help us better understand our audience's needs and to inform you about news about the Gate Theatre. We will only contact you electronically about non-contractually related information when we have your consent to do so.

We collect your information:

To carry out our business and to provide a service or carry out a contract with you:

- To fulfil ticket, merchandise, donation and supporter requests.
- To invite you to events as part of your supporter benefits.
- Process payments. We optionally allow you to store your card details for use in a future transaction. This is stored in a way where none of our staff members are able to see your full card number, only the last 4 digits on the card. We never store your 3 or 4 digit security code.
- Provide the best possible customer services and to help us with internal administration.
- Contact you with important information relating to your booking or purchase, such as confirming your order, reminding you of an upcoming performance you've booked for or letting you know about cast changes or building works that may affect your visit.

Where we have your consent to:

- Send you updates via email about what's on, ticket offers, and general Gate Theatre news
- Share information about how you can support the work of the Gate Theatre by becoming a supporter, or by making a donation
- Email you about a specific topic you've requested to hear more on such as specific productions, our community work or opportunities to support our work.
- Capture access requirements in order to ensure you have an enjoyable experience visiting our venue.
- Take pictures of you as a participant on a project.
- Advertise via digital advertising platforms about what's on, offers and news.
- Share your details with other arts organisations who have co-produced work you may have seen at or in collaboration with the Gate Theatre. These organisations should contact you to let you know how they collected your data and to check that you're happy to hear from them. You will always be able to opt out of their communications by contacting them directly.

Where we have a legal obligation to:

- Detect and reduce fraud and credit risk.

Where we have legitimate interest to:

- Send you updates via email about what's on, ticket offers, and general Gate Theatre news
- Learn about your interests and preferences so that we can contact you with information that is relevant to you.
- Help us target our marketing and fundraising communications and adverts so that they're more relevant to you.
- Send relevant invitations to events, press nights or other fundraising opportunities via post or phone if we believe this would be of interest.
- Use your pseudonymised details to show you advertising on such Social Media platforms as Facebook and Instagram or via other third party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
- Classify our audience into groups or segments, using booking and publicly-available information. These segments help us to understand our audience better and ensure we're sending relevant messages to each group. We may use third party processors to help achieve this. We also submit these anonymously as part of reporting to fundraising and public funding bodies (such as Arts Council England).
- Participate in the Audience Finder initiative or other initiatives as required by our Arts Council England NPO funding. This initiative builds an aggregate picture of local and national audiences across all Arts Council England National Portfolio Organisations. Their tools allow

us to understand how our audience in a local and national context and helps us to identify new audience opportunities.

- Measure and understand how our audiences respond to a variety of marketing activity so we can ensure our activity is well targeted, relevant and effective.
- Analyse and continually improve the services we offer including our artistic output, our website and our other products.
- Ensure we are maximising our ticket sales wherever possible.
- Film and photograph the spaces in our building. We will always give prior warning through signage in the spaces and a way to alert staff if you would rather not be captured.
- Help us run the test version of our website and CRM system that we use internally to pilot new features and ensure the smooth running of our customer services.
- Enable us to fundraise effectively because we are a charity. For further information, see the below section.

We also collect information in order to better inform our teams about prospective donors, to fulfil our fundraising goals as a charity. This is to ensure we are providing appropriate opportunities for people to support our work, should this form of engagement be of interest.

We are a registered charity and must raise over £240,000 a year from individuals, trusts and corporate supporters to enable us to continue staging ground-breaking international theatre with the most exciting artists, keep our ticket prices low and affordable for all and develop projects with our Young Associates and within our local community.

To do so, we aim to better understand both our audience's engagement with the Gate Theatre to ascertain any potential interest in supporting us further, and to identify potential future audiences and prospective individual, corporate and trust and foundation supporters through specific research.

We are committed to fundraising best practice and abide by the Fundraising Regulator's key principles and behaviours of a fundraising organisation: to be legal, open, honest and respectful. We undertake to comply with relevant law and regulations, including the Proceeds of Crime Act, Data Protection, Tax and Gift Aid legislation and Charity Commission guidance.

We will do this in a number of ways:

1. Current audience

We will seek additional information from a small number of our audience, including Gate Theatre booking patterns, individual connections, business network information and publicly available information relating to: residential location, wealth and assets, family (not including information about children unless given personally or made public by the individual concerned), career, donations to other organisations (including political parties where they are made public by the individual), hobbies and interests to create a profile of their interests and preferences.

This helps us understand the background and interests of the people who are currently engaging with our work and may subsequently choose to support us, enabling us to make appropriate invitations and requests for donations to those who may be able and willing to give. We may also use publicly sourced information and images to help identify individuals who attend our special events, and we may send information about upcoming events, workshops, talks and other invitations, if we believe these may be of interest. These could include opportunities to get closer to our work by joining as a supporter, making a philanthropic donation, through trust and foundation support or other relevant fundraising initiatives.

2. Current donors

We will ask all individual supporters and those who have made donations for their consent for us to email them specific fundraising email communications, or email them invitations as per the benefits of their engagement with us. We will always endeavour to tell them about the aspects of our work that we think are most relevant to their interests, including ways to support our artistic programme, our work with young people and community or talent development initiatives.

As part of supporter benefits (at Gate Keeper level and above) we ask for permission or preference for accreditation in programs, production free sheets, online in our annual review and on our supporter boards in our foyer. We respect the rights to anonymity if the donor so requests. Our aim is to always ensure our communications to our supporters are personal, relevant and timely, and designed to provide the most rewarding engagement with our work. Our donors tell us that tailored and relevant communication is a priority for them - we consistently review this and ask for feedback, to try and make sure we're getting this right.

We will also ask for consent from all supporters and donors to receive specific fundraising digital communications.

If you wish to receive fundraising communications via email, we encourage you to sign up to our mailing list and update your opt in preferences. You can also do this by telling our Box Office or Development Teams over the phone or in person. We respect anyone's right to withdraw their consent from this form of electronic communication and once informed of a preference change, we will cease this form of contact.

You can read about the Gate Theatre's donor charter [here](#).

3. Prospect research

We will use research from a number of different publicly available sources to identify potential supporters and their interests, in addition to those of our current supporters, aiding us in our fundraising activities. This may include newspaper websites and archives, housing market websites and the electoral roll as well as official websites of companies, charities and other arts organisations. In addition to this research we also make use of company, director and shareholder information from publicly available, officially registered information providers, such as trustfundraising.org, LinkedIn and 192.com.

If we have identified a specific company or trust and foundation through this research that we believe may be interested in supporting our work, we may contact the people specifically connected to these bodies via publicly available contact information, such as a relevant work email address. If we identify an individual, we may contact them via phone or by post. As a charity, we believe that this is in the legitimate interest of our fundraising needs. We will always ensure we conduct an appropriate legitimate interest assessment to ensure that we are not infringing on your rights.

The Development team monitors potential donations and partnerships for compliance and risk. Final decisions may be escalated to the Board of Trustees. It is our Board's responsibility to act in the best long-term interest of the Gate Theatre and to act prudently when deciding to accept or refuse voluntary contributions. The Board will refuse a gift if it can reasonably conclude that its acceptance would be more likely to be detrimental to the organisation than its refusal.

Who do we share your information with?

The Gate Theatre will never share, sell, rent or trade your personal information to any third parties for marketing purposes without your prior consent. We will ask for your consent to share personal information with organisations we have co-produced work with that you may have seen in our theatre or in collaboration with the Gate Theatre at another venue. These requests will be specific to the individual organisation so that your consent decision is informed.

We use a number of data processors in order to help us provide the services you request, for example our box office provider, Spektrix. These organisations are obligated to act on our instruction in relation to their use of your personal data and do not have any control over your data in their own right. We make sure anyone who provides a service for the Gate Theatre enters into an agreement with us and meets our standards for data security. They will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.

Examples of what data we may share and/or who we may share it with are as follows:

- Name on card, credit card number, billing address, CVV amount of transaction and order number with Spektrix and WorldPay in order to process credit card transactions
- Name on bank account, bank account number, sort code amount of Standing Order regular donation and customer number with your personal bank should you provide us with a Standing Order form to send to them
- Name and email address with Dotmailer in order to produce e-marketing campaigns and pre & post show emails (e-marketing campaigns require consent)
- Service providers who aggregate data in order for us to do benchmark reporting across the industry, specifically the Audience Agency for the purposes of the Audience Finder initiative. For more information on the data they collect, please refer to the following links on their website: <https://www.theaudienceagency.org/insight/data-collection-in-audience-finder><https://www.theaudienceagency.org/insight/data-control-in-audience-finder>
- List of major donors to funding bodies (we always respect anonymity where requested)
- Named third party organisations if you ticked the relevant opt-in box when you purchased tickets. In these instances, we may supply your personal information to that specific organisation only
 - We will only supply full name and email address in these data shares and only with your consent
- Other organisations such as competition organisers if you choose to take part in such activities that need administration by third parties and you choose to opt in for contact from those organisations.
 - We will only supply full name and email address in these data shares and only with your consent
- Third party advertisers (such as Facebook or Google) to help us identify customers similar to our audience or to serve adverts they deem relevant to you on third party websites. The information shared with these advertisers is pseudonymised to protect your personal data.
- Our ticketing system provider Spektrix who provide support should our ticketing system require maintenance
- Where required to do so (for example, if required to do so by the 'know your donor' principles under charity law or a court order), or when requested by the police or a regulatory or government authority investigating illegal activities

The Gate Theatre is not responsible for the privacy notices and practices of other websites even if accessed using links from www.gatetheatre.co.uk and recommends that you check the policy of each website you visit and contact its owner or the Data team if you have any concerns or questions.

Despite all our precautions, no data transmission over the internet is 100% secure. So, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention to the fact that you do so at your own risk.

How do we protect your data?

The Gate Theatre is committed to protecting the personal information you entrust to us. We adopt robust and appropriate technologies and policies, so the information we have about you is protected from unauthorised access and improper use e.g. your online account is encrypted and our own network is protected.

More info on protecting your data:

As part of the services offered to you through the Gate Theatre website, the personal information you provide may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if any of the computer servers used to host the website are located in a country outside of the EEA. If the Gate Theatre transfers your personal information outside of the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this privacy notice.

The Gate Theatre may transfer your data to the USA to organisations such as Facebook or Google. The USA has weaker data protection laws than that of the EEA and therefore we will ensure that only organisations who are a part of the EU privacy shield initiative will handle your personal information. More details on this certification can be found at www.privacyshield.gov/welcome

We will keep your information only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal obligations. We will not keep more information than we need. The retention period will vary according to the purpose, for example if purchasing a ticket only, we will typically keep your data for up to ten years from the date of your last point of engagement whereas if you have become a supporter of the Gate Theatre, we will hold your details indefinitely. For further information about how long we will keep your information, please contact the Data Team using the contact details outlined in this notice.

If you ask us to stop sending direct marketing communications to you, we will retain the information required (e.g. name, address or email address) to ensure we adhere with such requests.

What are your rights?

You should find it easy to access and amend the personal information that we hold on you, or request that we stop contacting you. It's your data and we want to make sure you feel in control of it.

More info on your rights

If you have an online account with us, you can amend your personal details and email contact preferences at any time. Simply sign in on the web site and access your account by selecting your name at the top of the page.

Or, if you prefer, you can contact us by phoning, emailing, or writing using our contact details below.

Every email we send to you will include details on how to change your communications preferences or unsubscribe from future communications.

You can request full details of personal information we hold about you under the Data Protection Act 1998, or after 25 May 2018, The General Data Protection Regulation, by contacting the Data

team. Please send a description of the information you would like to see, together with proof of your identity to data@gatetheatre.co.uk

At any time you have the right to ask the Gate Theatre to amend or to stop how it uses your personal information including for marketing purposes. You can do this by signing in to the website and accessing your account details or if you don't have an account or if you prefer to, you can contact us by phoning, emailing or writing using our contact details below. You have the right to get information held about you by us corrected. If you have any concern about the accuracy of your personal data, please let us know using the below contact details. If you would like us to remove the personal information we hold about you, please contact us using the below contact details.

By email: data@gatetheatre.co.uk By phone: +44 (0)20 7229 5387 By post: Gate Theatre office, 12 Pembridge Road, London, W11 3HL.

You have the right to lodge a complaint with the supervisory authority, The Information Commissioner's Office – www.ico.org.uk

Are you under 18?

If you are under 18, please ensure that you obtain your parent/guardian's consent beforehand whenever you provide personal information to the website. If you don't have that consent, you must not provide personal information to us.

Updates or Changes to the Privacy Policy and Further Information

This notice was updated on 21st May 2018.

It may be updated to take into account changes at the Gate Theatre or for example to reflect changes to regulation or legislation.

Updates to this policy will be posted on this page – please check back from time to time. We may also inform you of any changes where we hold an appropriate email address for you.

How do I find further information?

Further information on data protection regulations and laws can be found here:

Data Protection: <https://ico.org.uk/for-the-public>

Fundraising regulator: www.fundraisingregulator.org.uk/code-of-fundraising-practice/code-of-fundraising-practice