



## Privacy Policy

The Corn Exchange, Newbury will always store your personal details securely. We'll use your details to provide the service that you have requested, and communicate with you in the way(s) that you have actively agreed to. Your data may also be used for analysis purposes, for reporting to our funders, to help us provide the best service possible and to contact you about a booking you have made. We will never pass your details on to anyone else without your explicit consent. You are free to change your mind at any time by changing your contact preferences online, or by emailing [admin@cornexchangenew.co.uk](mailto:admin@cornexchangenew.co.uk)

### Contact details

Corn Exchange (Newbury) Trust, Corn Exchange, Market Place, Newbury RG14 5BD  
Tel 01635 582666 Email [admin@cornexchangenew.co.uk](mailto:admin@cornexchangenew.co.uk)

### What data we collect from you

We collect information you provide, like your name, address, telephone number (landline or mobile) and email address when processing your bookings and donations.

We may also use cookies to collect information about how visitors who have subscribed to our email lists are using the website. This data is not anonymised and we use the information to help improve our email communications and target specifically-tailored messages for our email subscribers.

We may also use Google Analytics cookies to collect information about how visitors use our site. The cookies collect information in an anonymous form, so we don't know who is using our site. We use the information on how people use our website to compile reports and to help us improve the site. You can go to <http://www.google.com/analytics/learn/privacy.html> to find out more about Google Analytics cookies and how to opt-out of them.

### What data we collect from third parties

In some circumstances, we also receive information about you from third parties that provide us with data to help us understand how we can provide the best experience for our audiences and how to best connect with you. This includes performing regular gone away and deceased record matching, to ensure that we best utilise the charity's limited resources.

If you book through a third party ticketing agency we receive your personal data from them in order to administer bookings. We will not use this personal data for any other purposes, unless you give us consent to do so.

### How we use your data

- We will use your telephone number and/or email address to contact you in the event of any changes to your booking which we feel is relevant – e.g. a cancelled

performance, a significant change to the line-up, any pre-show information that enables a smoother/better visit, changes to workshops or classes, or for post-show evaluation questions to help us improve what we do and provide feedback to our funders.

- We will use your email address to send you direct marketing, if you have opted in to receive emails about future performances, events, workshops and activities from us, or if you have booked similar events in the past. This will include sending you information about future shows and performances based on your booking history, so that you only receive information that is likely to be of interest to you.
- We will use your email address to send you information about our fundraising activities, including fundraising appeals, fundraising events, legacy fundraising, membership and newsletters, only if you have opted in to receive information about our fundraising programmes from us.
- We will use your banking details to process payments and donations you have made to us through our booking system. This system does not store credit/debit card details unless you choose to store them for future purchases. Our staff are not able to see your full card number and your security code is not stored. When we receive standing order mandates for donations or memberships we send the original mandate straight to your bank, and hold a copy, securely, for admin purposes. We will also use your personal data to claim Gift Aid, if applicable.
- We will use postcode information for data profiling to give us a sense of your cultural habits in order to inform our decision making process.
- For any party that signs up to the Corn Exchange's Digital Membership Card Scheme, names, email addresses [and anything else relevant] will be processed, solely in order to ensure the operation of the scheme and perform the contract.

#### **Legal basis under the GDPR by which we process your data**

- We will process personal data where this is necessary for the performance of a contract with you, if you are a supplier, artist or member of staff.
- Sometimes it may be necessary to process your data for us to comply with our legal obligations, like when we send Gift Aid information to HMRC.

#### **Consent:**

- We will only process your email address to send you direct marketing if we have your consent, or if you have booked similar events in the past.
- We will only process your personal data to send you information about our fundraising programmes, if we have your consent.
- We will only pass on your details and booking history to other relevant arts organisations (i.e. companies whose performances you have previously attended), including Newbury Spring Festival, if we have your consent.

- We will only process children's data (under 18's) if we have parental consent, for the purposes of running youth classes and children's workshops, in line with our safeguarding policy.

#### **Legitimate interests:**

- We will use your personal information to contact you in the event of changes to a booking you have made, e.g. to let you know about a cancelled performance.
- We will process your personal data for the purposes of internal reporting and analysis because we believe it is necessary for our legitimate organisational interests in creating better events, better communications, and a better website.
- We may use your address to mail you marketing, fundraising and membership information, and to send you administrative mail, including thank yous for donations.
- When you give us your personal information in connection with making a donation, we will also use this information (never your financial information) for internal reporting and analysis.
- We may share demographic information, but never personal information, with funders and the Audience Agency.
- We have conducted a legitimate interest assessment to ensure that this processing isn't overridden by your rights or interests. We employ safeguards, such as formal Data Protection and Data Retention policies, to protect your privacy.

To opt out of any of the above processing, please contact us.

#### **Automated decision-making and profiling**

We may use data profiling, such as audience segmentation by postcode or previous booking history, to inform our decision making.

To ensure that our limited resources are used efficiently, we may analyse your personal data and create a profile of your interests and preferences. In doing so we may make use of additional information about you, including where you live, your age and measures of wealth, when it is available from external sources such as public registers, online (including information you have made public on social media) or the electoral roll. We may use third party suppliers to undertake these activities on our behalf. This helps us understand a bit more about the people who support us so that we can make appropriate requests to those who may be able and willing to give more than they already do, enabling us to raise funds sooner and in a more tailored way than we otherwise would.

We use this information to target our direct marketing and fundraising—there are no other consequences of this profiling. To opt out of profiling or wealth screening, please contact us.

#### **You are under no legal requirement to provide your personal data**

You are not required to provide personal data to us. However, your failure to do so may affect our ability to provide the services you request – for instance, letting you know about changes or cancellations to a show or workshop you have booked for. We will not be liable for compensation in the event that we are not able to contact you regarding a performance that has been changed or cancelled.

## Data Subject Rights

Under the GDPR you, as the data subject, have the following rights:

- You have the right to ask us for a copy of the data we hold about you.
- You have the right to ask us to correct any data we hold about you.
- You have the right to ask us to delete the data we hold about you.
- You have the right to ask us to stop processing your data.
- You have the right to ask us to provide you with your data in a common, machine readable format.
- You have the right to restrict the processing of your data to specific purposes, i.e. you can object to receiving direct marketing or fundraising communications.
- You have the right not to be subject to automated decision taking, including profiling.
- You have the right to withdraw your consent at any time.
- You have the right to make a complaint to the Information Commissioner's Office - <https://ico.org.uk/>

We will not charge you for a copy of the data we hold about you, and will respond to requests within 1 month.

You can review and amend your preferences at any time by logging into your online account here. If any of the information we have is wrong, let us know and we'll correct it.

## Sharing your data

- We will never sell your personal data to another organisation.
- With your consent we may share your personal data to relevant arts organisations.
- We may disclose your personal data if required by law or to enforce our legal right.
- We may disclose your data to our affiliated organisations and subsidiaries, and to service providers who render services to us or you on our behalf (all of which are contractually obligated to act only on our instructions and in accordance with applicable laws, including GDPR), which includes Payroll services for staff.

## How long we will hold your data

- We will hold your personal data for as long as you hold an active account with the Corn Exchange. If you have an inactive account we will hold your data for a maximum of 5 years before gaining further consent, unless instructed differently by you.
- We will review our criteria for determining our retention period regularly.

### **How we secure your data**

We will collect, process and store your data safely and securely. Spektrix, our Box Office system, operates to the highest levels of digital and physical security. Its servers are located in a tier IV data centre in the UK with 24/7 onsite security and tightly restricted access control. Our system operates under the highest standards of card security and is Level 1 PCI compliant.

Personal data required to be processed for the operation of the Corn Exchange's Digital Membership Card Scheme will be processed outside of the EEA and will be processed by Cuseum Inc. ('Cuseum'), who are based in Boston, MA, USA. The Corn Exchange has an International Data Transfer Agreement in place with Cuseum which provides safeguards for the transfer, processing and storage of personal data. Cuseum is a cloud based service, which is hosted by data centres with the highest level of certifications, including ISO 27001 and SOC.

All of our staff are trained in current Data Protection regulations and are required to abide by our Data Protection Policy.

This Privacy Policy is available on our website and Front of House. An electronic copy can also be requested by emailing [admin@cornexhangenew.co.uk](mailto:admin@cornexhangenew.co.uk) or by telephoning 01635 582666.

We will notify constituents of any changes to this policy by email.

We are registered with the Fundraising Regulator and agree to ensure that our fundraising is legal, open, honest and respectful. We abide by the Fundraising Code of Practice.

**Version 1 Approved by Board January 2018**  
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