



GARSINGTON OPERA
AT WORMSLEY

PRIVACY POLICY

Document control

Document owner	Pippa Adamson
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Applies to	The policy applies to all individuals whose personal data is held by Garsington Opera Ltd, Garsington Opera Enterprises Limited or Garsington Productions Limited.

Amendment history:

Version and Approval History			
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About this policy

We are committed to respecting the personal information you share with us, complying with current regulations and using it appropriately. This policy aims to give you transparency about how and why we handle that data.

If you have any queries about this policy or how we use your personal information, please contact us using the details at the end of this document.

What information do we collect?

We obtain personal information from you when you enquire about our activities, become a member, donate to us, and purchase a ticket to an event. We may also receive information about you from third parties, for example our caterers, if you support our sister organisation American Friends of Garsington Opera, Inc, or from other organisations that have your consent to share your information with us.

Garsington Opera may hold personal data that has been created by us from other personal data that we already hold about you, either from internal or external research/profiling. This may be carried out by automated or manual processes and enables us to better understand you as a supporter and make appropriate requests for support. We may also be given information on potential donors via our trustees and key stakeholders for the purposes of fundraising events and other activity.

If you do not wish Garsington Opera to undertake this activity, please email development@garsingtonopera.org

The personal information we hold may include, but is not limited to:

- Your name
- Postal address
- Phone number
- Email address
- IP (Internet protocol) or MAC (Media Access Control) address
- Photographic, audio or video footage of audience members
- Payment card details (these are not stored digitally in a usable format and will only be kept until a payment has been made).
- We may also ask you from time to time to provide feedback on our programme and other events and will keep a record of these comments.

'Cookies'

'Cookies' are small pieces of information stored on the hard drive of a user's computer which contain information about the user. The information is used to track a visitor's use of the website and to compile statistical reports on website activity.

Garsington Opera may store information about your user preferences (e.g. preferred text size) using cookies (files which are sent by us to your computer or other access device) which we can access when you visit our site in the future. We do this to help enhance your interaction with our website.

If you want to delete any cookies that are already on your computer, please refer to instructions for your file management software to locate the file or directory that stores cookies.

If you want to prevent our cookies being stored on your computer in future, you may do so by referring to your internet browser's instructions. You can do this by clicking on the "Help" menu. Please note, however, that if you disable our cookies you may not be able to access certain areas of our site.

Links to other websites

Our website contains links to other websites. This Privacy Policy only applies to Garsington Opera's website so when you access links to other websites you should read their own privacy policies

How do we use this information?

We may use your personal information for the following purposes:

- to provide you with the services, products or information you have requested
- to administer the Garsington Opera membership network, if you are a member
- to provide you with our regular newsletter; (we will not sell, rent or lease our newsletter list to any third parties)
- to contact you about your membership and any events that you have attended
- to contact you about your support of Garsington Opera
- to process payment details if you make a donation or a payment
- to plan future activities and to further our charitable aims
- for administration purposes e.g. to administer donations, Gift Aid and payments.

We will only use your personal information for marketing purposes if we are allowed to do this by law or if we have your consent. If you would rather not receive marketing material from us, please let us know at any time using the contact details at the end of this policy. If you agree to us providing you with marketing information, you can always opt out at a later date.

How do we process this data?

We record the data preferences of all our members and audiences and observe their rights over their personal data as laid out in the General Data Protections Regulations. At any point, an individual has the right to object or remove permission for us to contact them, and we will act promptly to amend our records in line with their wishes.

We will process data under the basis of contractual, consent or legitimate interest. We consider that we have a legitimate interest in furthering the charitable aims of Garsington Opera by engaging people with our work and education. In order to do this, we need to be able to tell people about our activities, offer them memberships or to raise funds by donations, sponsorship or our commercial activities e.g. our retail offer.

Where we use Legitimate Interest, we have undertaken an Assessment to ensure we believe you would reasonably expect such information from ourselves and wouldn't consider it to be intrusive. As part of this:

- we will only contact people who have previously expressed an interest in our work
- the data is processed in accordance with current regulations / Privacy Policy
- people are given the opportunity to opt out of email communication either at the bottom of each digital communication or using the details at the bottom of this policy.
- from time to time we include information about similar organisations in our newsletters which we feel may benefit our members/audiences. This is not a paid service for which we receive a fee.

What are your rights?

Under data protection law, you have rights including:

- **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 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. Please contact us at the details at the end of this policy if you wish to make a request.

Do we share your information with anyone else?

We do not sell your information with third parties. We may need to provide your information to our contractors, suppliers or selected third parties who provide services on our behalf (e.g. our caterers, postage provider, the Young Artists Platform Tracker (YAP Tracker), our accounting software SAGE, a programme mailing house). This would only be to the extent necessary to enable you to receive those services that they are conducting on behalf of Garsington Opera.

Additionally, we may share your information with selected suppliers for the purposes of fundraising towards our charitable aims, this includes but is not limited to wealth screening services & fundraising consultants. We ensure these suppliers store, use and dispose of your data in accordance with our stringent data protection principles, for the sole benefit of Garsington Opera.

If you make a payment to us we will need to share your information with our payment processor, Tessitura Network, Inc. ("Tessitura") (see below for security information). We will only keep your payment information until a payment has been made and they will not be digitally stored in a useable format.

We are obliged to disclose your information if required to do so by law or as expressly permitted under the DPA.

How do we protect personal information?

We use a secure service when you make a donation or a payment through our website, via a virtual gateway operated by Tessitura. Our online payment system is PCI DSS compliant.

We will take all reasonable steps necessary to ensure that data transferred outside the EEA is treated securely and in accordance with this Privacy Policy.

We also take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

How to contact us

If for any reason you wish to contact us regarding this policy, or to update your data preferences, please let us know by writing to us at

Garsington Studios, Wallace Hill Farm, Stokenchurch, Buckinghamshire, HP14 3YF
or by email to boxoffice@garsingtonopera.org.

Registered UK charity number 1003042

Registered company number 02567390

Garsington Opera Enterprises registered company number 08511222.

How to make a complaint

If you wish to make a complaint about how we are using your data, please email boxoffice@garsingtonopera.org

Where you take the view that your personal data is processed in a way that does not comply with the UK GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you of the progress and outcome of your complaint. The supervisory authority in the UK is the ICO.

You can contact the ICO at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>