

Honiton Community Theatre Company (HCTC) privacy policy is a part of the constitution but is recorded separately so as not to confuse the reader. A single line referring to the privacy policy is held within the constitution.

The spirit of this privacy policy is to ensure any information that could be considered private is only used with the intention of improvement and in furtherance of the HCTC's constitution.

The main structure of this policy is in adherence with the General Data Protection Regulations (GDPR) which are in force with effect from 25th May 2018. The main rights to the individual considered to be relevant to members and those interacting with HCTC are shown below. For full details of GDPR please refer to the Information Commissioners Office (ico.org.uk) GDPR and relevant UK legislation will take precedence over this policy.

This policy should be reviewed annually alongside the constitution.

Responsibility for enforcing it rests jointly with the Chairperson and the committee appointed Data Protection Officer. Breaches of legislation and any financial compensation awarded as a result of a breach will be borne from the operating funds of HCTC.

All members will have

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing

1. Right to be informed. HCTC will inform individuals of HCTC's purposes for processing personal data, retention periods for that personal data, and who it will be shared with. We call this 'privacy information'. Privacy information will be provided to individuals at the time personal data is collected. **(On the google form - registration sheets etc.)** HCTC will obtain personal data from a number of sources eg. Membership registration forms, individual show registration forms, social event planning communications, photographs and videos of rehearsals, shows and events. Individuals will be provided with privacy information within a reasonable period of obtaining the data and no later than one month following registration and provision of personal data to HCTC. HCTC will not provide privacy information to individuals who already have the information or if it would involve disproportionate effort to provide it. The information HCTC provide will be concise, transparent, intelligible, easily accessible, and will be in clear and plain language. HCTC will review, and where necessary, update your privacy information at the start of every show cycle. HCTC will bring any new uses of an individual's personal data to their attention before data is processed. NOTE - Each time HCTC obtain personal data by request a statement will be agreed by the individual to note this policy.

2. Right of access. HCTC will enable all individuals to confirm that their data is being processed. HCTC will enable access to personal data. If requested HCTC will provide this information as soon as possible and in any case within one calendar month unless the request is complex or numerous. HCTC may seek an extension by a further two months if the request is complex or numerous in which case the individual will be informed within one month of receipt of the request that the extension is necessary. Requests will be processed

free of charge but if they are repetitive or excessive HCTC reserves the right to charge a reasonable fee to respond. Anyone wishing to access a copy of what personal data is held must make the request in writing to the Data Protection Officer at info@honitontheatre.co.uk.

3. Right to rectification. HCTC will rectify any personal data if it is inaccurate or incomplete. Individuals may request rectification verbally or in writing to the Chairperson. Individuals may request rectification by email to info@honitontheatre.co.uk. HCTC will respond within one calendar month to any request.

4. Right to erasure. Individuals may make a verbal or written request to the Data Protection Officer to have their personal data erased or "forgotten" at any stage. Written requests to be made by email to info@honitontheatre.co.uk. Upon request HCTC will erase personal data from all storage locations within one calendar month subject to section 4a. If a request becomes excessive or repetitive HCTC reserves the right to charge a reasonable fee. HCTC will operate the policy of erasing all personal data of non active members by 30th September each year. *All individuals with ongoing memberships will be required to complete a new registration form each year by 20th September within which will be confirmed their authority to store personal data for the forthcoming membership year and for purposes of marketing consent to use their personal data, still images, moving images, voice recordings. If an individual does not consent to the use of their personal information in this manner HCTC reserves the right to decline membership.*

4a. Personal data will not be erased under the following circumstances.

- to comply with a legal obligation
- for the performance of a task carried out in the public interest or in the exercise of official authority
- for the establishment, exercise or defence of legal claims

5. Right to restriction. Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted HCTC may be permitted to store the personal data, but not use it. An individual can make a request for restriction verbally or in writing to the Data Protection officer by email to info@honitontheatre.co.uk. HCTC will respond to a request within one calendar month.

JUNIOR MEMBERS

Each time a member under 18 years old appears in a performance or production HCTC has to obtain a performance licence. In order to comply with this legal requirement personal data relating to the junior member will be provided to the relevant agency charged with responsibility for issuing licences. As at 12th May 2018 this agency is Babcock Ltd. Babcock Ltd have confirmed that they use and store these details for purposes of issuing the licence and their data processing complies with GDPR.