

# Privacy policy

Threshold Festivals CIC is 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, from May 2018, the General Data Protection Regulation (GDPR).

## Who we are

Threshold Festivals is an arts organisation and a registered Community Interest Company (CIC). We receive some funding from Arts Council England and other funding bodies. The rest of our income comes from ticket sales (although some of our artistic programme is free), commercial partnerships, sponsorships and individual donations.

Threshold Festivals is a CIC registered in England number **08091493**

## What information do we collect?

The personal information that we collect includes:

- Name
- email
- transaction history, if you buy a ticket with us through iZettle or purchase merchandise from our webstore. If you buy through our ticket partners, they will keep this information (we never store your whole card number, although we may keep a note of the last four digits to help us identify transactions)
- details of visits to our website including traffic data, location data, operating system, browser usage, and the resources that you access
- image and likeness (as captured in photographs and videos we use for promotional purposes)

## How do we collect your information?

You give us your information when you buy a ticket, make a purchase from our shop, buy something online, sign up for one of our events, tell us your story, make a pledge, apply for a job, or communicate with us. We also keep your details when you sign up to receive emails from us.

We keep a record of the emails 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 through our mailing list partner Mailchimp. 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 Threshold Festival 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 events they might be interested in.

We may also obtain personal information about you from other sources, such as if a family member or friend contacts us on your behalf. Where this occurs and it is not practical for us to provide you directly with a copy of our privacy policy, we may ask the person who provided us with your information to make this privacy policy available to you.

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

### Third party organisations

Your information may be shared with us by independent fundraising sites if we run a crowdfunding campaign as we did in 2017. If you make a donation to, but only when you have indicated that you give your consent to hear from us. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

### 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, Instagram 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.

## **How we keep your details safe and secure**

Your personal data will be held and processed in a secure encrypted system or systems managed by suppliers on behalf of Threshold Festivals such as Mailchimp.

We always seek to hold your data securely. Access to customer information is strictly controlled. The customer information can only be accessed by company directors.

## **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 pledge.

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 pledging to us, to better understand your interests, to carry out screening on potential donors and to conduct due diligence 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. Threshold Festival also records and uses film, photographs and audio for promotional purposes on its website, social media accounts and other formats under its legitimate interests 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 vital interests
- we have your consent to do so.

## **Giving you control**

We may tell you about events, concerts, shop offers, priority booking and information about our site. You can opt out from these marketing communications at any time - every email sent to you will tell you how to do this.

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

## **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
- to funding bodies, particularly Arts Council England, who may use anonymised personal information to analyse our audience development programmes, ticket sales and self-generated funding to understand the impact of the public investment made in Threshold Festivals.
- Data processing services acting in an accordance with our instructions, and subject to confidentiality obligations

## How long do we keep your information?

We may retain information for a period of six years after your association with us has come to an end. Some information may be retained indefinitely for historical, statistical or research purposes. As stated below, you have the right to require us to erase personal data.

## 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

Once the GDPR takes effect in May 2018, you will 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 information we hold about you:

- Email us at [team@thresholdfestival.co.uk](mailto:team@thresholdfestival.co.uk)
- Or write to us at: Threshold Festivals CIC, 27, 24 Fenwick Street, Liverpool L2 7NE