The Two Moors Festival Limited Privacy Policy

This privacy notice tells you what to expect when the Two Moors Festival collects personal information. It applies to information we collect about:

- Visitors to our websites
- People who use our services, e.g. who subscribe to our newsletter or request a publication from us
- Job applicants and our current and former employees

Key details

- Policy approved by board/management: 9 March 2018
- Policy became operational on: 9 March 2018
- Reviewed on: 28 June 2023
- Next review date: 28 June 2024

Why this policy exists

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

This data management policy ensures The Two Moors Festival Limited:

- Complies with data protection law and follows good practice
- Protects the rights of customers, staff and partners
- Is transparent about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Introduction

The Two Moors Festival Limited is committed to protecting your personal information. It is your information, it is personal, and we respect that. We also want to maintain the trust and confidence of every one of our audience members and supporters, as well as each visitor who uses the Two Moors Festival website.

Our Privacy Policy gives you detailed information on when and why we collect your personal information, how we use it and how we keep it secure.

Aside from helping us deliver truly exceptional performances and events, the information you share with us means you will receive a more personalised and rewarding experience, e.g. information about performances, exhibitions and new works that may interest you, as well as a smoother ticket-buying process.

Registering with the Two Moors Festival has many benefits, not least the opportunity to manage your personal information and receive information about our work.

How We Collect Your Personal Information

Generally, we collect your information when you decide to interact with us. This could include purchasing tickets online, over the telephone or in person or it could be where you sign up to receive emails from us. We also look at how our audience uses our website, so that we can offer the best possible experience whether you are booking tickets or just trying to find out more about our latest productions.

We collect information in a number of ways, which are listed below:

1. When you create an account at www.twomoorsfestival.co.uk. Your account allows you do the following:
    - Buy tickets, gift certificates or packages of tickets
    - Join as a member
    - Make a donation
2. Contact us by telephone to book tickets
3. Book tickets in person at the box office
4. Contact us by post, e.g. application forms for Friends members

5. Visit our website: we use cookies to help make the experience of using our website better and to personalise the service you receive from us – this means we will remember your previous visits and track the pages on our website that you visit. For more information on 'cookies' please see our Cookie Policy. When you visit www.twomoorsfestival.co.uk, the Festival's web server automatically records your public internet protocol ('IP') address and also generates a log file.
6. From time to time, we may also get data about you from third parties – please see the 'How we may use your information' section for more details. This could include other artistic venues where you have seen the Two Moors Festival's work or partners that we have run competitions with.

The Types of Information We Collect
We only collect the information that is necessary to carry out our business, provide the particular service you have requested and to keep you informed. There are occasions when you can choose not to give us certain information, but this for example, may limit the level of personalisation we offer, e.g. you may not get to hear about an event you would have liked to attend.

The type of information we collect depends on where and when it is gathered.

Information we obtain directly from you:
When you create an account with us, register on our website or purchase tickets or other items from us online, by post or telephone we need to collect information from you in order to provide the service you are requesting.

We may collect:
- Prefix and name
- Gender
- Email address
- Date of Birth
- Contact phone number(s)
- Payment card details. (Please note, we will not hold payment information for any longer than it takes to process your transaction.)
- Delivery address(s)
- Billing address

If you are a student we may also collect:
- Name of college/university
- Area of college/university
- Course name
- Course faculty
- Course level
- Course end date

When visiting our website we may collect the following information:
- Automatically populated IP address: a 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.

Information we obtain independently from you:
Your information may be shared with us by independent organisations, e.g. other arts organisations that Two Moors Festival has worked with. These independent organisations will only do so when it is required to complete a contract and/or when you have indicated your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process and safeguard your data.

Third Party Organisations:
We may combine information you have given to us with this additional information available from external sources. This will only be done when you give permission to the relevant third party organisations to share the data they hold on you, or if the data is already publicly available.

Data Hygiene:
From time to time we may screen our database against a recognised data hygiene file such as National Change of Address file and cleanse our file or correct inaccurate data. We may also update inaccurate data if the information is available.

Social Media:
Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you may give us permission to access information from those accounts or services.

Information available publicly:
We may include information found in places such as Companies House and information that has been published in articles/newspapers.

Why We Collect Your Personal Information and How We Use It
The information we hold on you will be used in a number of ways. Here are the main ones:

- to provide a service you have requested
- offer you a personalised experience and understand our audience's needs better
- inform you of events or updates you have asked for
- contact you if we need to obtain or provide additional information (e.g. cast changes)

Specifically, we use your information we collect in the following ways:

- To carry out our business and to provide a service or carry out a contract with you:
    - To fulfil ticket, merchandise, donation and membership requests
    - Process payments – please note that the Two Moors Festival does not store any Credit Card or other payment information once the transaction has been completed
    - 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 have booked for or letting you know about cast changes or building works that may affect your visit
- Where we have your consent:
    - Send you updates via email about what's on, offers and news or about supporting us
    - Email you about a specific topic you have requested to hear more on such as cinemas, our student scheme or other projects
    - Share your details with other arts organisations whose work you may have seen at or in collaboration with the Two Moors Festival – these organisations will contact you to let you know how they collected your data and to check that you are still happy to hear from them – you will always be able to opt out of their communications by contacting them directly
- Where we have justifiable reason (including legal obligation and legitimate interest):
    - Learn about your interests and preferences so that we can contact you with information that is relevant to you
    - Help us target our marketing communications and adverts so that they're more relevant to you
    - 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.
    - For classifying 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.

- 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.
- Undertake consumer research: we may contact you to ask you to participate in consumer research either via an online or telephone survey or in person. You are under no obligation to participate in research and, should you provide any further information, the Two Moors Festival will inform you how any further information will be used.
- Analyse and continually improve the services we offer including our artistic output, our website and our other products.
- To help us run the test version of our website that we use internally to pilot new features and ensure the smooth running of our web services.
- To keep our database accurate and relevant, for example, using National Change of Address.
- Detect and reduce fraud and credit risk.

For a small number of our audience, we may want to better understand people's engagement with the Two Moors Festival and their potential interest in supporting us further:

Before contacting a small number of individuals we may seek additional information including Two Moors Festival booking and connections, business network information and publicly available information relating to: residential location, wealth and assets, family*, career, donations to other organisations (including political parties where they are made public by the individual) and hobbies and interests to create a profile of their interests and preferences. This helps us understand the background of the people who may choose to support us and helps us to make requests for gifts to those who may be able and willing to give. We may also use publicly sourced images to help identify individuals who attend our special events. For further information on applied data please see the table below.

* This does not include information about children unless given personally or made public by the individual concerned

We use a number of different sources to aid us in our fundraising activities, including 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 general use of the internet we also make use of company, director and shareholder information from publicly available, officially registered information providers, such as the below organisations:

192.com - UK Electoral Roll and Directory Inquiries - http://www.192.com/
Trustfunding - Database of UK Trusts and foundations grants - http://www.trustfunding.org.uk/default.aspx

How We Handle Your Information and Other Organizations
The Two Moors Festival 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 like-minded arts organisations whose shows you will have seen here at the Two Moors Festival or in collaboration with us at another venue.

Some of our service providers may have access to your data in order to perform services on our behalf – payment processing is a good example of this. We make sure anyone who provides a service for the Two Moors Festival 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.

We may share your details with:

- Service providers who work on behalf of the Two Moors Festival for the performance of any contract we enter into with them or you, for example payment processing, printers and mailing houses, marketing agencies, database services, website hosting or email delivery service.
- 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.

- Other organisations such as competition organizers 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.
- Third party data services, for example Experian, who help us to segment and understand our audience by providing additional information so that we can send the most relevant and targeted communications possible.
- Third party advertisers (such as Facebook or Google) to help us identify customers similar to our audience or to serve relevant adverts to you on third party websites. The information shared with these advertisers is pseudonymised to protect your personal data.
- 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 Two Moors Festival is not responsible for the privacy notices and practices of other websites even if accessed using links from www.twomoorsfestival.co.uk and recommends that you check the policy of each website you visit and contact its owner or Data Protection Manager if you have any concerns or questions.

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

How We Protect Your Data
The Two Moors Festival 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.

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 transaction whereas if you have pledged a legacy to the Two Moors Festival, we will hold your details until notified by your executors. For further information about how long we will keep your information, please contact the Data Protection Manager using the contact details outlined in this notice.

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

Choices
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 is your data and we want to make sure you feel in control of it.

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 website and access your account by selecting your name at the top of the page.

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

At any time you have the right to ask the Two Moors Festival to amend or 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 do not have an account or if you prefer to, you can contact us by telephoning, 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 contact details below.

By email: info@twomoorsfestival.co.uk
By Phone: 01769 575526
By Post: Lime Court, Pathfields Business Park, South Molton, EX36 3LH

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

Updates or Changes to the Privacy Policy and Further Information
This notice was updated on 28 June 2021. It may be updated to take into account changes at the Two Moors Festival 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.

When your data is provided to us by another person (for example a recommendation) or a publicly accessible sources (such as Google) we will tell you where we obtained the information within a month of getting it.

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