

FRIENDS OF SHARMANKA

Sharmanka Kinetic Theatre | Trongate 103 | Glasgow | G1 5HD
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PRIVACY POLICY

We respect your privacy and have developed this privacy policy to demonstrate our commitment to protecting your privacy and compliance with current UK legislations.

PURPOSE OF THE POLICY

We are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop a better understanding of our customers and in turn to provide you with the most relevant and timely information about the work that we do - both on and off stage. As a registered charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we [and all of our subsidiaries] collect and use the information we collect from you directly and from third parties.

This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Our use of cookies to improve your use of our website
- Information about how we keep your personal information secure, how we maintain it and your rights to be able to access it.

If you have any queries about this policy, please use the contact details listed at the end of this policy.

WHO WE ARE

Friends of Sharmanka, operating as **Sharmanka Kinetic Theatre** and/or **Sharmanka**, is a Scottish registered charity (**SC023931**) that receives public, project based funding from Creative Scotland to produce and present artwork in accordance with our Mission Statement. Friends of Sharmanka is also registered with **Companies House** under registration number **SC159830**.

When we refer to “we” or “our” or “us” or “Sharmanka” or “Sharmanka Kinetic” or “Sharmanka Theatre” we are referring to Friends of Sharmanka.

INFORMATION COLLECTION

Sharmanka collects various types of information about you during interactions and purchases you make.

By submitting your details, you agree to Sharmanka Kinetic Theatre (and where applicable, external venues that we work with / exhibit in / execute projects) to provide you with the services, activities or online content you select.

Information you give us

When you register with one of our online systems to buy tickets, purchase merchandise, make a donation or sign up to any of our events, activities or services, we'll store personal information you give us such as your name, email address, postal address, telephone number and card details.

We will also store a record of your purchases and donations. From time to time we may also collect, use and share aggregated data such as statistical or demographic data. This may be derived from personal data that we hold but this is not considered personal data by law as it does not directly or indirectly reveal your identity.

Information about your interactions with us

When you participate in Sharmanka's activities, such as newsletters, blogs, online events etc we collect information about how you interact with our content and adverts. Also, when we send you a mailing we store a record of this, and in the case of emails, where possible, we keep a record of which ones you have opened and which links you have clicked on.

Information from third parties

We occasionally receive information about you from third parties. For example, we may receive information such as name and email address or have specific access requirements if a company hosting a show at our venue has invited you or if you have booked via an external booking source like ticketsource.co.uk, via analytics providers such as Google, advertising networks such as Facebook, Instagram, or from search information providers such as Google AdWords.

We also use cookies, which are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function as well to provide website operators with information on how the site is being used.

We use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we can make.

Sharmanka will never purchase data from, nor sell data to third parties.

Sensitive personal data

Data laws recognise that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not actively collect this type of information about our customers unless there is a clear pragmatic operational reason for doing so.

For example, when signing up for our Sharmanka Workshops programme we may require medical information and emergency contact details.

CCTV/Surveillance

We have installed a CCTV system within our venue premises for the purposes of public and staff safety and crime prevention and detection. CCTV is also installed at the public spaces of Trongate 103 (location of our theatre) and the outside of the Trongate 103 building for the purposes of building security and crime prevention and detection.

In all locations, signs are displayed notifying you that CCTV is in operation. CCTV system is located in a secure area in the venue and the data it captures is password protected to prevent unauthorised access. We will only disclose images and audio to authorised bodies who intend to use it for the purposes stated above. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing.

LEGAL BASIS GROUNDS

We will only use your personal information when the law allows us to. Note that we may process your personal information for more than one legitimate reason depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been stipulated.

i. Legitimate Interest

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, if you have been to see a live music event, we may contact you about other new music events.

ii. Legal or Regulatory Obligation

Where we need to comply with legal and regulatory requests from governing bodies like the police.

iii. Explicit Consent

Where we have your explicit consent before using your personal information in that specific situation

MARKETING COMMUNICATIONS

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful, and never excessive. To do this, we use data that we have stored about you, such as the events you have booked in the past, as well as any contact preferences you may have told us about.

We use legitimate interest as the legal basis for collating a list of customers to communicate with by post and email but for your peace of mind we use explicit consent (via the contact preferences set when you were booking your tickets, or signing up to our mailing list, or making a merchandise purchase) as the final check prior to sending these communications.

If you are happy for both, we will always prioritise email over post for both cost monitoring and environmental reasons.

To change your contact preferences, you can use the contact details at the end of this policy or update them.

As part of our service to you, we may contact you by email or telephone to provide essential information related to your purchase, visit or any other engagement with Sharmanka.

FUNDRISING COMMUNICATIONS

Friends of Sharmanka is a registered charity (SC159830) and is registered with the Office of the Scottish Charity Regulator (UK) - aka OSCR.

Under legitimate interest, we may contact you by post or email to promote ways you can support us and the work that we do. This contact will be based on your activities and purchase history with us.

Aside from this, and only if you have given your consent, we may contact you to seek your financial support.

OTHER PROCESSING ACTIVITIES

We may analyse data we hold about you to ensure that the content and timing of the communications we send is as relevant to you as possible, as well as analyse data we hold about you to identify and prevent fraud.

In order to improve our website, we may analyse information about how you use it and the content and ads that you interact with. Such information is compiled using publicly available data about you.

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden.

You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

THIRD PARTIES

In general, we will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies).

Service Providers

Sharmanka will keep your information completely confidential, including never disclosing any private or sensitive data when providing analytical reports or applying for funding. Sharmanka requires these third parties to comply strictly with its instructions and that they do not use your personal information for their own business purposes unless you have explicitly consented to the use of your personal information in this way. This permission would be obtained separately from the standard permissions currently in place along with documentation stipulating the full details of the requests.

Apps

We may offer the facility for you to sign-in to our systems via a third-party service app (e.g. Facebook / Instagram / Zoom) to interact with us. Whilst Sharmanka may endeavour to offer you an alternative option that will enable you to interact with us without using a third-party, this may not always be possible.

Social Media

If you choose to interact with us via any of our social media streams (e.g. Facebook, Vimeo, Instagram etc) Sharmanka may receive or have access to information about you, this is based upon what you have chosen to share in your social media accounts. Sharmanka does not use this information and relies solely on the social media channels aggregated marketing data tools along with posts directly on our pages.

To change any permission or to manage the viewing of our posts, please refer to your social media provider.

YOUR DEBIT AND CREDIT CARD INFORMATION

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

You can find more information about this standard [here](#).

For transparency in our ticketing system (TicketSource) there is the functionality to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS and in a way where none of our staff members are able to see your full card number. We never store your 3 or 4-digit security code.

All of the other payment systems in Sharmanka (such as Zettle platform we use for sales of merchandise, in-house tickets, and payment link we send of online sales) utilise a one-time entry and use for card information.

MAINTAINING YOUR PERSONAL INFORMATION

If you wish to make changes to the information or permission you provided, please use contact details at the end of this policy to get in touch with us via email.

For logging exclusions from processing activities or any other amendments you require that are not covered above, please see the Contact Details & Further Information section of this policy.

Retention Periods

We will hold your personal information on our systems for as long as is necessary for the relevant activity.

If you request that your account be deleted we will deactivate it on the database and, while Sharmanka cannot use the personal information, it will remain on the system for administration and financial regulatory purposes before being fully deleted, timescale for this will be determined on a case-by-case basis. During this time, you can request for it to be reactivated at any point.

Sharmanka Kinetic Theatre, as a publicly funded organisation, also has an obligation to keep a record of its history, which may include user generated content, e.g. feedback and reviews. Therefore, some content submitted to, or shared with Sharmanka may be retained for prolonged periods of time or potentially indefinitely in Sharmanka's Archives.

Sharmanka's archive is currently managed and maintained by Friends of Sharmanka. Information on Sharmanka's activities and projects is regularly added to the physical & digital archiving system in-house and online.

YOUR RIGHTS TO YOUR PERSONAL INFORMATION

Under the General Data Protection Regulations, you have rights, which are detailed below. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below. If you are a European citizen and consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.

Request access to your personal information

You have a right to request a copy of the personal information that we hold about you.

Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

Request deletion of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons - which will be notified to you at the time of your request.

Object to processing of your personal information

You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground if you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing your personal information

You have the right to request that we suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the accuracy of the data;
- (b) where our use of the data is unlawful, but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
- or (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please also note the following:

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

