



Privacy policy

- Our customers, supporters and artists are important to us. Spot On relies on your trust and we want you to know that we will always follow the law and best practice when it comes to handling your data.
- We will never bombard you with information that we think you won't like, that you're not interested in or that is irrelevant to you. We will always listen and adhere to your current communications preferences. If you ever feel like you are receiving information that you don't want or are not interested in, let us know.
- We will only analyse your data to communicate with you more effectively or to help improve your experience of visiting us, and to ensure that we are achieving our goals.
- We will never sell your information, share it with a third party who will misuse it or handle it insensitively.
- You have control over your data and personal information. If you have any questions, would like to change your preferences or opt-out of communications, just call our friendly team on 01254 660360. You can read our full privacy policy below.

Spot On ("we") are committed to protecting and respecting your privacy. This policy sets out the basis on how we process, handle and use any personal data we collect from you, or that you provide to us. Please read the following carefully to understand our approach to and practices regarding your personal data and how we will treat it.

Why this policy exists:

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 audiences and in turn to provide you with relevant and timely information about the work we do.

The purpose of this privacy policy is to ensure that Spot On:

- Complies with General Data Protection Regulation law and follows good practice;
- Protects your rights;

- Is transparent about how it stores and processes your data;
- Protects itself from the risks of a data breach;
- Provides you with a clear explanation on how we and our subsidiaries collect and use data we receive 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 for you and your rights to be able to access it.

If you have any enquiries about this policy, please contact hello@spotonlancashire.co.uk

Who we are

Spot On is a project managed by Robinson Howell Partnership Ltd on behalf of Lancashire County Council and is funded by Arts Council England (ACE), Lancashire County Council and local borough councils. Robinson Howell Partnership is a registered company in England and Wales under registration number 5204838.

Spot On is Lancashire's rural and library touring scheme and our mission is to provide professional arts on your doorstep. We work with rural venues and libraries all over Lancashire, offering a variety of performing arts events for those communities to host. We strive to offer a service where no one in Lancashire is ever more than 5 miles away from a Spot On venue.

Spot On sits under the Culturapedia umbrella which is a trading name of Robinson Howell Partnership. Under the Culturapedia umbrella we also host our sister project 'Plugged In' which works in Darwen Library Theatre and Burnley Mechanics. Each project is responsible for its own data records and personal data is never shared between venues, but anonymised data such as how many tickets are sold for each production is shared.

INFORMATION COLLECTION

We collect several types of information and in several ways:

Information you give us

Information that you provide by corresponding with us by phone, email, letters, or otherwise, as well as by filling in forms on our website www.spotonlancashire.co.uk or physical forms such as feedback evaluation, supporter card membership forms, job applications, artist applications and/or commission applications.

This information will include any details you provide when you subscribe to our mailing list, search for a product, place an order on our website, participate in social media functions through our website, enter a competition, promotion or survey (on our website, via social media, through email communications, or physically) and when you report a problem with our website. If you have previously (prior to 25 May 2018) provided us with consent to be contacted by signing up to our e-newsletter via the website or provided your consent to be contacted with marketing communications at point of ticket sale/booking, this data is stored in our ticketing CRM system and we may contact you in line with your preferences.

The information you give us may include but may not be limited to your name, address, email address, phone number and any emergency contact details we may need, as well as access needs, photo consent and emergency contacts. If you make a payment through our online ticketing provider or through our PayPal account then financial and/or credit card information is stored by that provider and complies with strict financial data protection.

The personal information you supply to us by opting-in to marketing communications (when you sign up, buy tickets, join our membership schemes, for example) will be used by Spot On to keep you up to date with events, share good news and information from Spot On. Each email we send you offers you the opportunity to amend these preferences including to opt-out.

- If you contact us we will keep a record of that correspondence and incorporate the information, it contains into our database. However, we promise we will only use this data to contact you if we feel you will find it relevant, useful or necessary. We will not tell you about things we know you're not interested in. You are always welcome to update your preferences or unsubscribe if we are contacting you too frequently.

Information about your interactions with us

To make sure your online experience with us is a positive one, we may monitor anonymised data about how customers are using our website. This data can never be linked to your person:

- Personal Data recorded technically: this can include the Internet Protocol (IP) address; browser type and version; the device used to visit our website; time-zone setting; browser versions; operating system and platform, how you have come to be on our website (e.g. via social media, via a search engine)

- Information about your visit including: The Uniform Resource Locators (URL) clickstream to, through and from our site (including time and date); number of visits to our website and to particular pages; products you have viewed or searched for; page response times; download errors; lengths of visit to the website or pages; page interaction information (e.g. hover-overs, image clicks)

Regarding communications, email communication interaction information, we may automatically collect the following information:

- Page interaction information (e.g. hover-overs, image clicks)

We manage most data through our email CRM (Customer Relationship Management) system and our online ticketing account, both cloud-based systems that allow us to:

- Monitor customers and the tickets they've purchased, money spent, events they've attended, venues they've visited. This allows us to ensure we are programming future works that may prove popular, we can view a customer's progress and involvement with us over time, and we can submit the correct information to our finance departments, amongst other reasons.
- Store personal details of patrons: contact details, gender, age. This is part of our monitoring required by external funders, allows us to contact you in an emergency, and ensure that participants are attending age-appropriate events and activities, amongst other reasons.
- Record donations and Gift Aid status, where applicable. This information is legally required by the HMRC and our financial records.
- Record any communication we have had with patrons e.g. receiving of our e-news. We may record additional correspondence, e.g. if we wrote personally to a donor, but this is not set practice. This allows us to closely monitor how often we are contacting customers and what about.

Our CRM system does not store any bank or credit/debit card details.

As part of our grant agreements, we also share anonymised postcode data for Spot On audiences and participants (if information has been provided and permission has been granted during the sign-up process) with Audience Agency, Arts Council and other funding bodies. This allows us to have a clear picture on where our audiences are coming from and we run the same report each year to compare our progress.

As part of our Arts Council England funding, we also use the Audience Agency to collect anonymous data from our customers. This data can include postcodes and art forms, but this data will never be linked to an individual; it will be anonymous. You can read Audience Agency's privacy policy [here](#). (The Audience Agency is a mission-led charity: Their purpose is to enable cultural organisations to use our national data to increase their relevance, reach and resilience. You can read more about them [here](#).)

- Information from third parties

Spot On will only gain anonymised information about you from other venues, organisations or artists that are either programmed by Spot On.

In questionnaires or feedback surveys, Spot On venues will ask whether you would like to hear from themselves, the production company of the show/event that you have attended, and Spot On, and ask for your email and/or postal address if you answer yes to any.

- Collection of data for users under 18

We do host performance events for young people under 18. We only collect this information from a parent/carer/guardian, we do not collect this information directly from the child. We collect this information to ensure we offer age appropriate activities, that we can monitor a young person's involvement, that we can keep them safe within our space (photo consent and emergency contact details) and we can provide anonymised data to our funders (such as ages and postcodes.) On very rare occasions we may also offer workshops or specific projects with young people but we would seek specific data in these instances. Information we collect about your child includes:

- Full name
- Age and DOB
- Address
- Photo consent
- Access Requirements
- Medical history
- What school they attended
- Family relationships, including parents and siblings
- Sensitive personal data

We may collect sensitive personal information about you, including information about your racial or ethnic origin, your religious beliefs or other beliefs, and whether you have any access requirements or disabilities. We collect this information if you or we believe it may impact on your safety, enjoyment and involvement with Spot On, for example if you need to use a hearing loop, or require additional facilitators to participate, or can't eat certain foods. Such sensitive personal data will only ever be collected after having obtained your explicit consent to do so or where it is necessary to do so to comply with legal requirements, including for employment law purposes.

- Cookies

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. It makes it possible for us to provide our online services, including purchasing tickets, as well as tracking visitor statistics. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a positive experience when browsing our website and will also inform us on how to improve our website. Cookies are anonymous so while they collect information about how the site is being used, they will not identify an individual. We use the anonymous information to see how people are using our site and to help us improve our site. We do this through Google Analytics, and you can read their privacy details here:

<http://www.google.com/analytics/learn/privacy.html>

USES MADE OF INFORMATION – LEGAL BASIS

- **Contract purposes**

When you make a purchase from us, a booking with us, or donate to us, you are entering into a contract with us. To perform this contract, we need to process and store your data. For example, we will need to provide you with a booking confirmation via email or we may need to contact you by email or telephone in the case of a cancellation of a show or in case of problems with your payment.

- **Legitimate business interests**

In certain situations, we collect and process your personal data for purposes that are in our legitimate organisational interest. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all the situations where we may use this basis for processing.

- **With your explicit consent**

For any situations where the two bases (contract purposes or legitimate business interests) above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation. Only with your explicit consent will we provide you with news from third parties and fundraising. Visiting production companies may hand out questionnaires or feedback forms which will ask you to consent to hear from them directly. If you sign up for this, the visiting production company will be responsible for their own Privacy Policy and how they store and use your data.

Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked in the past, including free events, as well any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for any marketing communications by postal mailings and email, including pre-show information emails. We believe that audience members, patrons, participants and their guardians are connected to our mission and to our products and that they would be interested in future events and pre-show information to help them have the best possible visit they can.

In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. When you provide your postal address (usually through our feedback form) you must 'opt-in' to receive postal mailing from us. In the case of email, we will only contact people who have agreed to be contacted by email. We will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.

Unless you tell us not to, we think you are content for us to process (keep and use) your personal information for the following lengths of time. We will only contact you with marketing communications if you have signed up to our mailing list or purchased/booked a

ticket from Spot On within the past three years. As of May 2018, we promise not to keep your personal information for longer than 16 years; this is for analysis purposes to ensure we are achieving our aims and providing customers with the best possible experience.

Other processing activities

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests:

- We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.
- We may analyse data we hold about you to identify and prevent fraud.
- To improve your experience on our website, we may analyse how you use our website and the content and adverts that you interact with.
- To send surveys. We promise not to send too many surveys, but as it is necessary for us to report feedback from our customers and audiences to our funders and supporters, we will occasionally need to send out a survey via email to our customers and audiences.
- Photography – we will ask audience members to provide consent for us to take photography of them and their children. Whenever we take photography, we will make you aware that that is what we're doing and that these photographs may be used on our social media, website and/or other marketing materials. You have the right to say no to us taking photographs of you or your children. All photos will be saved in a protected folder with restricted access.
- To provide anonymised data to our funders, specifically Arts Council England and Lancashire County Council.
- To remind you your Spot On Supporter Card membership is due for renewal.

In all the above cases we will always keep your rights and interests at heart to ensure that they are not overridden. You have the right to object to any of this processing at any time. If you wish to do so, please use the contact details at the end of this policy. Please bear in mind that if you object to any of these processing systems, it may affect our ability to carry out tasks above that are for your benefit or it may affect our funding and therefore our offer and output. For example, we could not contact you if a class or show has been cancelled that you were due to attend, or we could not provide HMRC with financial records to evidence donations.

Third parties

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To the subsidiaries described above when it is necessary for them to be able to provide you with products or services that you have requested.
- To our own service providers who process data on our behalf and on our instructions (for example our ticketing system software provider). In these cases, we require that these third parties comply strictly with our instructions and with data protection laws, particularly with the security of personal data.

- To service providers of postal marketing communications. In these cases, we require that these third parties comply strictly with our instructions and with data protection laws, particularly with the security of personal data.
- Where we are under a duty to disclose your personal information to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- To specific named visiting companies whose performances you have attended. In these cases, we will always ask for your explicit consent before doing so.
- If you have consented to hear from third parties via our Spot On feedback forms.

Storing your personal data

All personal information stored by us is kept on our Customer Database. Unless stated in your preferences, which are agreed by you, only employees and approved contractors and/or developers who we may employ, and who need the information to perform a specific job, are granted access to personally identifiable information. When this happens, we will have a data sharing agreement contract with third parties to ensure safe and secure practice. We take all reasonable precautions to store and protect your information securely and in accordance with this privacy policy.

Your debit and credit card information

Our ticketing system is managed by Ticketsource. Our supporter card membership payment is managed by PayPal. If you use your credit or debit card to purchase from either systems your purchase 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](#). Any payment transactions will be encrypted.

Security of your personal information

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

Your rights

You have a right to request a copy of the personal information we hold about you and to have any inaccuracies in this data corrected. You have the right to ask us not to process your personal data for marketing and fundraising purposes. You have the right to request no marketing communications from us and to update your communications preferences at any time. Please use the contact details at the end of this policy if you would like to exercise any of these rights.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email if we have your email address. Please check back frequently to see any updates or changes to our privacy policy.

Contact details and further information

Please get in touch with us if you have any questions about any aspect of this privacy policy, and if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

If you wish to contact us about our Privacy Policy or your data, please contact Spot On HQ,
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