

**Here at the Roundhouse, we are committed to protecting the privacy of our supporters and stakeholders. Please read this policy which, together with our website and cookies policy, explains how we collect, manage, use and protect your personal information.**

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## Who are we?

### Our vision

The Roundhouse is a hub of inspiration where artists and emerging talent create extraordinary work and where young people can grow creatively as individuals. We believe in the power of creativity to change lives.

As a charity we rely on our audiences, supporters, team members and many other people who become involved with us to be able to deliver this vision and to deliver our creative programme for young people and our artistic programme. To achieve this, we need to undertake a number of activities that make use of personal and anonymous information.

This Privacy Notice explains what personal data we collect, what we do with the information you give us and your rights over that data.

We are committed to protecting the privacy and confidentiality of your personal information and we aim to ensure that all personal information in our possession is processed in accordance with the principles of the General Data Protection Regulations [GDPR] and the Information Commissioner's Office.

Depending on which experiences and services you use, we will hold different kinds of information from or about you.

### Our details

The Roundhouse is a charitable company limited by guarantee  
Company number: 3572184  
Charity number: 1071487  
ICO registration number: Z6514282

### Contacting us

If you would like to update or opt out of receiving marketing communications from us, you can do this by logging into your account on the [website](#).

If you would like to make an enquiry about data protection or change the way we process your information, you can [click here](#) to fill in an online form to contact our onsite Visitor Services team or call us at 0300 6789 222 (option 1, then option 2)

If you would like to make a request to access the information we hold about you see 'Your rights' section at the end of this document or email [subjectaccess@roundhouse.org.uk](mailto:subjectaccess@roundhouse.org.uk). To raise a concern about how your personal information has been used; please write to us at:

Post: Data Team, The Roundhouse Trust, Chalk Farm Road, London NW1 8EH

More information about our complaints process can be found [here](#). Alternatively, you are entitled to raise a concern to the Information Commissioner's Office (ICO) without first referring your complaint to us. [See here for more information](#)

## What information do we collect?

Personal information is collected directly from you when you interact with the Roundhouse and this will change depending on the experiences or services you are accessing. Typically,

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we collect your name, contact details, geolocation, access requirements and payment details when you:

- ask us for information
- book tickets or into a creative project with us
- purchase items from us
- send us an email
- use, register or sign into the website. Find out more about cookies
- apply for Membership
- make a donation to us
- enter a competition
- take a survey
- join or subscribe to our social media channels
- participate in an event

To help us report to funders and to safeguard young people participating in our programmes we may collect further information such as date of birth, age, sex, disability, race, sexual orientation, access needs when you:

- purchase certain tickets
- register for a project
- apply for a job
- participate in project
- join as an Emerging Artist
- participate in an evaluation or research survey

Information may be collected in person, over the phone, through our websites, social media, mobile devices or from something you've posted to us.

The payment card information you supply to us for any online transaction is used solely for the purpose of processing that transaction.

### **How do we use your information?**

We use your information, both personal and anonymised, in these ways:

- Provide an experience or service you have requested
- Communicate with you
- Build an understanding of audiences, improve existing experiences or create new ones
- Measure the effectiveness of our digital marketing
- Raise awareness of our charitable work and ways you can support it
- Report anonymised statistics and impact to our funders

### **Provide an experience or service you have requested**

We offer a range of experiences and services where you will have provided information to us. We will use this information to process your payment and contact details, payment amount, date and time of payment; to process that payment and take any follow-up administrative action needed (for example, sending a booking confirmation). We will also use information to:

- administer your membership
- administer gifts, bequests, donations and legacies made by you or on your behalf
- supply you with goods or services ordered from us e.g. tickets
- manage your attendance on a project

If you are making a donation and choose to include Gift Aid, then we will also ask for your address and UK taxpayer status as this information is [required by law](#). You can read more

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about how Gift Aid works [here](#). This information is needed for us to fulfil our obligations under tax ([sections 413 to 430 Income Tax Act 2007](#)) and charity law. Information associated with Gift Aid declarations must be retained for 7 years. This information will be shared with HMRC for tax regulation purposes and may also be shared with the Fundraising Regulator and the Charity Commission in the event of an enquiry or investigation.

### **To communicate with you**

There are a number of ways that we may communicate with you. We use information you have provided to:

- communicate with you by telephone, social media, text, email and/or post about our activities, promotions and events in accordance with any preferences you have set.
- deliver service emails such as purchase confirmation emails and show time changes or cancellations.
- contact you and ask you to respond to surveys such as post show, creative programme evaluations and membership surveys.
- inform you about our performances and projects we think you may be interested in, if you have opted to receive such notifications.
- respond to a question, comment, compliment or complaint that you have sent to us, in this situation we will also keep a record of this correspondence and any associated documents so that we have the information available in the event of a follow-up, dispute or investigation.
- inform you if we make significant changes to our policies which may affect you.
- support you in participating in or attending an event that we have organised, this may require us to ask you to provide information to make sure we can manage the event safely and efficiently. We may also ask you for details of any accessibility need which you may have, so that we ensure our event is inclusive, in line with the provisions of the Equality Act 2010.

We may use your information to invite you to become involved with us in new ways, raise funds and grow our supporter base.

### **Sharing marketing and fundraising materials with you**

Marketing and fundraising materials that we might share with you include information about our activities and their impact, our news, events and fundraising appeals, and other ways you can become involved with us.

Where you have provided your postal address or telephone number we may send this information to you by post or by calling your telephone events if you have said that we can. We may also email you this information or send by SMS if you have agreed for us to do so.

You can let us know at any time if you'd prefer to change how we share this information with you or stop it altogether. Simply use the details we've provided in the 'Contacting us' section to let us know your preferences. If you receive our e-newsletters, you can also use the unsubscribe link in the emails we send.

We will keep your personal information for no longer than is necessary for the purposes for which it is processed. If you ask us not to contact you, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

### **To build an understanding of audiences, improve existing experiences or create new ones**

We undertake various research and analysis of our audiences such as ticket buyers and members. We do this because it allows us to understand our audience members and the

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people who support us, and helps us to send appropriate communications and make appropriate requests to those who may be able and interested in attending or giving more than they already do.

We also perform analysis on the experiences, services and projects we offer. We do this so we can understand how well we are performing and to help create a better experience for you.

### **Targeting our communications and researching our supporters**

As a charity, we have a duty to make sure that we're spending your donations wisely, and that means doing some research and analysis to inform our decisions. We want to send the most effective messages that we can in the most efficient way possible. In order to work out who to contact, what to say and when to get in touch, we carry out the following activities:

*Analysing how emails are opened and read* – we track emails which we have sent to you to see which messages have the highest response rates and whether there are messages that resonate with particular groups of people. We do this by logging whether emails we send have been opened, deleted and interacted with (for example, by clicking on links within the emails).

*Segmentation* – this is where we analyse information such as postcodes, and whether you buy tickets or make donations on a regular basis. This helps us to tailor appropriate communications to you, as well as improve your experience as a Roundhouse customer or supporter.

*Analysing our supporter base* to send different communications to people who might choose to give or make higher donations – we undertake in-house research and engage other organisations such as [Factory](#) to help us identify people who may be able to support us or those who may be able to make larger gifts; using information you have given us and publicly available records such as the electoral roll, land records, 'rich lists', Who's Who publications and Companies House records. We may also collect information on your interests, for example board memberships, hobbies, or articles about you in newspapers or magazines. You can find more information about the [sources we might use here](#). We use this information to tailor our communication with you and invite potential supporters to meetings, groups and events which may be of interest to them.

*Finding other people like you* who might like to hear from us - We may use the email address you give us to help find more people like you, so that we can grow our audience and supporter base through our online channels. We use third party services to do this which you are likely to be familiar with, including Google, Facebook and Twitter.

**When might we add information to your record that you may not have given to us directly?** We may also add information or update your record with us, from publicly available sources. This may include your telephone number, address related information, information from death registers, age or the information mentioned in the section above 'Targeting our communications and researching our supporters'. We use this information to tailor our communications with you and send you more appropriate information.

These activities form a vital part of keeping support for our work going. You can request more information on these activities, or change your preferences, by using the information in the 'Contacting us' section at the beginning of this document.

### **We may use your information to enforce and comply with the law**

We ensure that our activities comply with the law. Therefore we may need to share or use your personal information if we are required to do so by law (for example; in response to a

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warrant or court order) and we may use information from other sources for the purposes of fraud prevention, for example to comply with money laundering regulations, or to protect people's rights, property or safety.

### **To measure the effectiveness of digital marketing**

Where we advertise upcoming tickets or events on the internet, we use cookies and other technologies such as pixel tags and tracking links to help measure the effectiveness of our advertising campaigns.

### **To report to our funders**

We provide anonymised ticket booking data to the Arts Council England and their affiliates (the Audience Agency). We do this so that they can understand the impact of the public investment made to us.

Anonymised statistics on our artistic programme, youth and community programmes, membership, ticket sales and donations are published in our annual report and annual review. We also analyse the performance of services and projects and provide information to our stakeholders, funders and community partners as part of our ongoing relationships with them. You can see a list of our current [funders here](#).

### **If you have visited our websites**

When you use our websites, some cookies are saved to your computer that do lots of different jobs. We log the IP address of the computer you are using in order to protect our servers against abuse and malicious activity. The logs are deleted every 30 days. Other information is used to measure the performance of the website, how site users move around the site and what sort of users the site attracts, manage the volume of traffic that the site receives and send information back to online advertising services such as Google and Facebook. You can find out more in our website and cookies policy.

### **How do we store your data securely?**

Your data is always held securely. We maintain a Customer Relationship Management system called Tessitura and access is strictly controlled to people who need it to do their job. Certain data, for example sensitive or children's data has additional controls and is only made visible to members of staff who have a reason to work with it, all of these staff members have been DBS checked. In addition, we protect your personal information in a range of ways including secure servers, firewalls and SSL encryption.

### **When do we share your data with other organisations?**

We commit to making all reasonable efforts to keep your details secure and will only share them with partners, suppliers or professional agents working on our behalf, for example our partners when a gig or event is run in partnership with them. Any personal information you provide to us will be shared with these partners and their subcontractors for the purposes of providing a service you have purchased or signed up for. We will only share information with them if we are confident that they will protect it, and we have a contract in place with them that assures this.

- We will only disclose your information to companies who act as "data processors" on our behalf, some of whom may be outside the UK/EEA.
- We will only share your details for marketing purposes if you have given explicit consent to do this. We will never sell your personal information to any third party organisation.
- We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

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- We will only ever share your data in other circumstances if we have your explicit and informed consent.

Certain third party organisations collect information on our behalf as well as for their own use. We may receive your personal details from other organisations for our marketing purposes where you have consented for this information to be shared, for example Just Giving and Virgin Money Giving. These organisations have their own data protection and privacy policies and we urge you to make yourself aware of these before signing up. If you participate in an event organised by an external party or make a donation through a processor like JustGiving, then your information may be passed to us by the processor. We would only use it for marketing purposes if you have given your consent for this.

We may also use other companies to provide experiences or services and process your personal information on our behalf, including delivering postal mail, making telephone calls, sending emails, sending SMS messages, processing credit card payments and analyse our supporter information as outlined above, to help us offer you communications that are most appropriate to you and your interests. In some cases, our suppliers may use software which analyses publicly available information (as outlined above) to build up a picture about you based on the factors set out in the 'Targeting our communications and researching our supporters' section.

### **Transfer of personal information outside of the EEA**

We are aware that countries outside the European Economic Area have differing approaches to data privacy laws, and that enforcement may not be as robust as it is within Europe's borders.

The transfer of your information is governed by EU model contract clauses which set out how the organisation outside the EEA is required to protect your privacy rights by adhering to European data protection standards.

Organisations we work with who process personal information in the USA have verified their data processing standards meet the EU-US Privacy Shield, which sets out clear safeguards and transparency responsibilities for US-based organisations processing personal information from EU citizens.

Where data is transferred outside the UK/EEA and without the protection of EU-US Privacy Shield, we will take extra steps to anonymise the data and follow a rigorous retention schedule to ensure that any data processor we use provides an adequate level of protection for your data.

### **Who are our partners?**

#### **More about our direct marketing**

You may indicate your preference for receiving direct marketing from us, our affiliates or any partner organisations with whom we may work and whose goods or services we think may be of interest to you. You will be given the opportunity to indicate that you no longer wish to receive our direct marketing material or that sent by third parties on our behalf each time we contact you, whenever you log into our services or make a payment to us. Once properly notified by you, we will take steps to stop using your information in this way.

#### **Do we collect children's data?**

As part of the Roundhouse Youth Programme, we routinely collect data for children under 16 with consent from their parent/guardian. From age 16 plus we collect data from young people directly in accordance with this policy.

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Information about children is stored securely, can only be accessed by staff with a current Enhanced Children's Disclosure and Barring Service (DBS) check and is anonymised as soon as it is no longer needed.

If we need to collect information for children, other than in the circumstances described above, we will ensure that such information is handled in accordance with this policy.

### **If you are applying for a job with the Roundhouse**

Your CV, covering letter and application form for any position with the Roundhouse will be used during the recruitment process to short-list suitable candidates who will be invited to proceed to the interview stage, and to select the final candidate that the role will be offered to.

We sometimes use third-party job application platforms, for example recruitment agencies, to publish and receive applications for roles at the Roundhouse. When you apply through these portals the organisation's privacy information will be available to you. We only work alongside other organisations in this way if we are satisfied that they will keep your information safely and use it only in the same legal ways that we would.

During the recruitment process, we will perform some checks on your identity, your right to work in the UK, your eligibility to work with vulnerable people and your past employment references.

If you are appointed to the position, your information will form part of your personnel file and will be stored securely. To safeguard young people, we undertake a DBS check on all Roundhouse employees, this data is retained for the duration of your employment and destroyed 2 years after you leave our employment.

We delete the personal information of unsuccessful applications 6 months after the application process ends in case there are follow-up queries about the process, unless a candidate requests that we keep their details for longer. Statistical information like ethnicity, sexuality and disability is kept to ensure that our recruitment processes are inclusive and not discriminatory, but this is completely anonymised.

If we are required by law to share your information, (for example; in response to a warrant or court order), we will do so.

### **What are your rights to your information?**

You have the following rights related to your personal data:

- The right to request a copy of personal information held about you and for it to be provided in a format that can be shared by you with others
- The right to request that inaccuracies be corrected
- The right to be forgotten and request under certain circumstances that we erase any information we hold about you
- The right to request us to stop or restrict the processing of your personal data
- The right to withdraw consent and object to certain processing such as direct marketing
- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

**How to request copies of all of the information we hold about you, otherwise known as a Subject Access Request**



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You have the right to ask for a copy of all of the information related to you that we are processing. You can request this emailing [subjectaccess@roundhouse.org.uk](mailto:subjectaccess@roundhouse.org.uk).

### **How to ask us to amend or delete your information**

If your information is incorrect, out of date or if there is no longer justification for us to hold it, you can ask for it to be updated, removed or blocked from our use.

### **How to request your information so that you can use it elsewhere**

You can ask for a copy of any personal information that you have provided to us in the past. We will provide it in a clear and easy to follow format. Please note that if you ask for the material to be sent electronically but prefer not to use our secure file transfer, the Roundhouse cannot be held responsible for the security risk to your information as it travels across the Internet.

### **How to ask us to 'forget' you**

Under GDPR you have the right to ask to be forgotten. This allows you to ask us to delete all personally identifiable data that we hold about you. There are a few legal exemptions that require us to keep some data for a set period of time, such as if you have given us a Gift Aid Declaration to allow us to claim gift aid against any donations you have made to us, then we are required by HMRC to keep this declaration for 7 years. Or, if you have tickets for an upcoming event we would need to keep your details until after the event has taken place in order to inform you of any changes.

## **Our legal basis for contacting you and using your personal information**

When you sign up to a newsletter or opt-in to our communications using our forms (e.g. email subscription or a donation form) or in person, then you are giving us your consent to send you marketing and fundraising materials by the methods you have chosen (e.g. email or phone call). We will never send you marketing by email or SMS without your consent, and you can withdraw your consent at any time.

If you have provided us with your postal or telephone contact details, but haven't specifically opted-in to receive our communications (for example, event marketing or making a donation by post), then we will carry out an assessment of whether it would be fair and reasonable to use them to send marketing and fundraising information to you without your explicit consent (i.e. it is in the interests of our aims as a charity and will not cause undue prejudice to you). This is called a "legitimate interests assessment". You can opt out of our marketing and fundraising communications at any time if you don't want to receive them.

We will ensure we have a legal basis to use your personal information for the other purposes mentioned in this policy (usually with your consent, further to a legitimate interests assessment, or because the use of your data is necessary to comply with a legal obligation)."

You can find out more about your data protection rights on the Information Commissioner's Office (ICO) [website here](#).

You can find out more about data protection law here:

[Data Protection Act 1998 until the 25th May 2018](#)

[General Data Protection Regulation 2018 from 25th May 2018](#)

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### **Changing our policy**

The Roundhouse reserves the right to make alterations from time to time. We will place any updates we make to this policy on our website. Please check this website from time to time for the latest version.

This policy was last updated in May 2018.