



# Privacy Policy

## May 2018

This policy applies to all data obtained, held and utilised by Sinfonia Viva. By disclosing your personal information to Sinfonia Viva or by accessing our desktop or mobile websites, in person or over the telephone, you consent to the collection, storage and processing of your personal information by Sinfonia Viva. Further information on this is detailed below.

### **The purpose of this policy:**

- To offer an insight into how Sinfonia Viva protects your personal information and ensures that it is gathered, stored and used in an ethical and transparent manner
- To improve our services and your experience of engaging with Sinfonia Viva

### **General Information:**

The information we collect allows us to provide a personalised and better customer service. Information that we might hold includes:

- Name
- Address
- Telephone number
- Email address
- Ticketing history
- Billing information
- Information acquired via cookies & analytics

The information is held by Sinfonia Viva in the most accurate and up to date way possible. Please update us regarding any possible discrepancies with the data we hold.

We are committed to:

- Making you aware of the salient facts in an easy-to-read notice at the point of data collection
- You will not be contacted with any marketing messages that you have specifically 'opted out' for and this service can be cancelled at any time by contacting Sinfonia Viva by phone, email, or 'opting out' using the 'opt out' button on all correspondence sent to you
- We will provide you with all information we hold on you, if this is requested by yourself

- Your personal information will not be passed on to outside to 3rd party organisations without your consent, unless:
  - Anonymised information is to be used only for research, data analysis and administration for reporting to funding partners
  - Unless required by law
  - In order to process a transaction where personal information pertaining to yourself, may be passed on to third party service providers. (However card details will only be used for the purpose of handling an individual transaction)

To contact Sinfonia Viva directly to be removed from our database please contact [info@vivaorch.co.uk](mailto:info@vivaorch.co.uk) or via telephone on 01332 207570.

If at any point prior to a concert or show, we feel there is a change to your booking that you need to be made aware of we will contact you.

With agreement about data management protocols and security, we do sometimes make anonymised data available to funding agencies for analysis and research purposes (this might include, for instance, comparison sales trends over time, big data analysis and postcode mapping). This assists our organisation when reporting to funding partners and with future strategic planning – making us a better organisation, with a more diverse programme of things that you want to see.

### **Online cookies:**

Cookies are stored by your web browser when you log onto a website on your computer, tablet or mobile. Cookies enable an enhanced experience by tracking the use of Sinfonia Viva's website, allowing us to improve our service and user interface. Cookies are anonymised, however you can turn this function off to not allow cookies to be used on your device manually.

### **Google analytics:**

Google analytics packages are used on our website to observe statistics and improve online services and user interfaces. We use Google analytics to:

- Collect anonymised, non-personal data
- Provide a better user experience
- Isolate preferences
- Diagnose technical problems
- Analyse trends
- Reporting to funders

If you wish to not participate in Google Analytics, please see this link:

<https://tools.google.com/dlpage/gaoptout>

### **Box office security:**

Sinfonia Viva currently runs its in house box office through Ticketsource. TicketSource is a member of STAR (the Society of Ticket Agents and Retailers) which requires TicketSource to comply with an industry Code of Practice. TicketSource also uses the latest extended validation security (EV SSL) certificate and is PCI DSS compliant ensuring that tickets are sold in a safe and secure environment.

To view Ticketsource's full Privacy Policy please visit - <https://www.ticketsource.co.uk/kb/terms-of-use/privacy-policy>

### **Fundraising:**

Information may also be held for fundraising purposes. This is in order for us to report and track donations, report to funding partners and track fundraising activity taking place. If you wish to have your Information removed from our database please contact [info@vivaorch.co.uk](mailto:info@vivaorch.co.uk) or via telephone on 01332 207570.

### **Emails:**

By contacting Sinfonia Viva directly via email you agree to have your email data stored on our system unless specified otherwise. Please contact us directly if you wish to be removed from our system. Unless specified, email contact will be removed automatically after 3 years of inactive correspondence from any contact.

### **Your Rights:**

You have the following rights related to your personal data:

- The right to request a copy of personal information held about you
- The right to request that inaccuracies be corrected
- The right to request us to stop processing your personal data
- The right to ask to be deleted from our systems
- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

## **Business to Business Privacy & Data Handling Policy**

# **May 2018**

This policy applies to all staff in the obtaining, storing and usage of data including:

- Senior managers and the board of trustees
- Paid staff

- Volunteers and sessional workers
- Agency staff
- Students
- Anyone working on behalf of Sinfonia Viva

### **The purpose of this policy:**

- To ensure transparency and our commitment to providing clear, honest and open information outlining how we gather, store and use data
- Define how we use data appropriately and in a way that would be reasonably expected for business needs
- To guarantee that we follow best working practices which are adhered to at all times
- To safeguard personal information and outline our commitment to being accountable and responsible for data we hold
- To give businesses and individuals the choice about how we store and use their data

### **Data acquisition:**

- Data will be gathered in a responsible manner, for the legitimate interest of both parties under GDPR and PECR
- General contact information found in the public domain will be used upon first contact, with 'opt out' opportunities offered in every subsequent email contact via an email signature
- Long standing and warm business contacts already engaged prior to GDPR rollout on 25<sup>th</sup> May 2018, will be retained under legitimate interest – with 'opt out' opportunities offered in every subsequent email contact via an email signature
- Cold calls to individuals business or personal email accounts or contact numbers will not be made unless consent, legitimate interest, or performance of a contract is applicable.

### **Data retention:**

- Sinfonia Viva is accountable and responsible for all data held by our organisation.
- 'Opt Out' options are available through all email interactions via an email signature, alongside Privacy Policy held on the Sinfonia Viva website
- Sales-related contracts, employment-related contracts and general business contracts will clearly state what data is retained and subsequently used in a mutually beneficial manner for both parties and for business needs
- Gateways to 'Opt Out' of contact, data deletion and to find out exactly what data Sinfonia Viva holds on you ,will be available through all email interactions and via the Sinfonia Viva website
- Sinfonia Viva is **accountable and responsible** for data held and we take active steps to protect customer data from 'data breaches'

- Sinfonia Viva staff understand data handling principles and their responsibilities in delivering them

**Data usage:**

- Personal information will not be passed on to any third party without consent being given specifically by the relevant individual unless required by law or in order to process a transaction
- Data will be held in a secure system and will be used for the benefit of both parties to meet business needs
- Data will be used as a reference for future business and contracting
- We will not use data in a way not stated in this document