

Privacy Policy

Introduction

Absolute Classics respects your privacy and is committed to protecting your personal data. This privacy policy explains who we are, how we collect and use Personal Information, and how you can exercise your privacy rights.

Who are we?

Absolute Classics is a Scottish Charitable Incorporated Organisation (SCIO) regulated by the Office of the Scottish Charity Regulator (OSCR) and was registered as a charity on the 15th January 2014 – Charity number SC044584. Further details can be found on the OSCR website www.oscr.org.uk.

You can contact Absolute Classics and our data Protection Officer regarding our processing of your personal data via our website www.absoluteclassics.co.uk or by writing to:

Absolute Classics
Bridge House
9 High Street
Annan
DG12 6AD

Information we collect

We don't receive any personal data about you other than what you provide us by completing a patron or evaluation form, by signing up to our mailing list (electronic and/or post) or by contacting us directly via our website's contact form, emails and/or letter.

We engage third party suppliers for fundraising (Just Giving), direct marketing purposes (MailChimp) and online ticket sales (Midsteeple Box Office). We have ensured their Privacy Policies enable us to continue to meet our obligations under the Data Protection Act (DPA) and the Privacy and Electronic Communications Regulations (PECR). You can view their Privacy Policies at the following website addresses:

MailChimp – <https://mailchimp.com/legal/privacy/>

Just Giving – <https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20>

Midsteeple – <http://www.dumgal.gov.uk/article/15087/Privacy-and-cookies>

The information collected by Absolute Classics includes the following:

- names of individuals
- postal addresses
- email addresses
- telephone numbers
- gift aid status
- date and amount of any donations
- online identifiers, such as internet protocol (IP) address and timestamp
- preferences in receiving marketing from us and your communication preferences

We also collect aggregated data such as statistical or demographic data, which may be derived from your personal information but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate data from audience evaluation questionnaires to report to our funders.

We may use various technologies to collect and store information when you use our website or social media platforms, and this may include using cookies and similar tracking technologies. They also allow us to collect information such as your IP address, browser, email client type and other similar details. We use this information to measure the performance of marketing campaigns, and to provide analytics information and enhance the effectiveness of our Services. Our use of cookies and other tracking technologies is discussed in more detail in our Cookie Statement available on our website.

We do not collect any special categories of personal data such as race, ethnicity, affiliations, religious or philosophical beliefs, or information about your health. Nor do we collect any information about criminal convictions and offences.

What happens if you don't want us to have your personal information?

You are not required to provide personal information to us. However, if you choose not to do so, it may affect our ability to provide the services you request, but we will notify you if this is the case at the time.

How do we use your personal information?

Absolute Classics uses your personal information to provide the services you request, to send you communications and to enhance your experiences of our services. We also use your data to help us make our programmes better and to advertise to you.

Services requested and communications:

We use your information to provide our services to you:

- processing donations and claiming Gift Aid, if applicable
- providing updates and information for education programme participants
- annual programme brochure mail out
- communication emails regarding concerts and education activities
- invitations to patrons' events

We only send these with your consent. To stop receiving communications, click unsubscribe on any email or contact us directly via our website or by post.

Making Absolute Classics better:

We use aggregated and personal data about you and your use of our services to develop our programmes, report to our funders and to better understand our audiences and participants. We undertake this analysis using a variety of data sources – transactional data (how you use the services), click stream and log data (web traffic), email data (how you respond to emails we send you), survey data and data you agree to share with us from your Facebook account. We may send you surveys about our services, but you can opt out of receiving these and participation is completely voluntary.

Advertising:

Aside from sending marketing communications by email, we may target ads to our audiences and measure how they perform, both through our services and through other channels like social media.

On what legal bases do we process your personal information?

We process your personal information on a variety of legal bases depending on the use, however we typically only rely on consent as a legal basis for processing your personal information. For example, we will only process your personal information to send you direct marketing if we have your consent and you can withdraw this consent at any time by opting out of receiving such emails. Sometimes it is necessary to process your information for us to comply with our legal obligations, like when we send Gift Aid information to HMRC, and we will only be able to do so with your consent.

How do we share personal information?

We may disclose your personal information to our affiliated organisations and service providers who render services to us or you on our behalf (all of which are contractually obligated to act only on our instructions and in accordance with applicable laws, including GDPR). We also may disclose your information if required by law, requested by law enforcement authorities or to enforce our legal rights, such as pursuant to a subpoena or to HMRC when you claim Gift Aid.

Our service providers include:

- banks and payment providers – to authorise and complete payment transactions
- IT, information security and cloud services providers – to keep information safe
- communication providers – to assist us with the processing and delivery of email and other communications
- behavioural analytics tools – to collect and help us understand data when you use our services, described in the How do we use your personal information? section
- ticket sales and venue providers – to provide ticketing and box office services

Funders:

We sometimes share data with our funders, so they can understand how well our funded programmes are progressing or have performed. The information we share with funders includes aggregated data, audience and/or participant feedback and images taken at events. We do not share personal data with funders.

Data Protection Rights

You have the following data protection rights:

- To access, correct, update or request deletion of your personal information. Absolute Classics takes reasonable steps to ensure that the information we collect is reliable for its intended use, accurate, complete and up to date.
- To object to processing, ask to restrict processing or request portability of your personal information. You can exercise these rights by contacting us using the contact details provided in the Who are we? section at the beginning of this policy.

- To withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- To complain to a data protection authority about the collection and use of personal information. For more information, please contact your local data protection authority. We would, however appreciate the chance to deal with any concern you may have about how we use your personal information before you approach the authority so please contact us in the first instance.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request.

Our Security

We take appropriate and reasonable technical and organisational measures to protect your personal information from loss, misuse, unauthorised access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the personal information. In addition, we limit access to your personal information to those employees and third parties who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long will you use my personal information for?

We keep your personal information in an identifiable form for as long as necessary to fulfil the purposes we collected it for and as required by law. If you claim Gift Aid on a donation you make, we are required by HMRC to keep data related to your donation for six years after the tax year in which the donation was made.

This policy was agreed by the Absolute Classics' Board of Trustees on 24th May 2018 and will be reviewed annually. We reserve the right to update this Privacy Policy at any time.