We at Laura H Drane Associates is a company limited by guarantee registered in England and Wales under company number 07568755 whose registered office is at c/o

Godfrey Wilson, 5th Floor, Mariner House 62 Prince Street Bristol, BSI 4QD

The term "you" refers to the individual accessing and/or submitting Information to the Website.

We are committed to protecting and respecting the privacy of your personal information and want to maintain the trust and confidence of our service users as well as our online visitors through our Laura H Drane Associates website at www.laurahdrane.com and any subdomain or any such related website and/or mobile application for such website (the "Website") and social media pages.

We, as the Data Controller, can be contacted via Laura Drane email <a href="mailto:ldrane@lauraHdrane.com">ldrane@lauraHdrane.com</a>

This Privacy Policy gives you detailed information on when and why we collect your personal information, how we use it and how we keep it secure.

As Data Controller we are responsible for, and control the processing of, your Personal Data in accordance with applicable Privacy and Data Protection Requirements.

We use Personal Data to ensure that we contact you with relevant information that you want to hear about, such as latest news, campaigns, projects, training and networks, developments of the company, ways to support us and the sector we work in.

Registering your personal details with Laura H Drane Associates through Mailchimp has many benefits, including being able to manage your personal information and the information you receive from us about our activities.

# Why do we collect personal information?

We collect personal information depending on the service we are offering to you; this could be as a service provider, training, networking opportunities or if you deal with us on behalf of your business. We also collect information about people who are visiting our Website or social media pages.

## Visiting our website

We gather Personal Data about you to ensure that we can provide you with a service that meets your needs and to inform you of our services and updates you've asked for or to contact you if we need to obtain or provide additional information.

- Provide the best possible customer experience and to help us with internal administration.
- Purchase a training or events through Paypal or Eventbrite

Some of Laura H Drane Associates activities are sold through PayPal. PayPal will hold the Personal Data you have provided them with. They will also provide us with this information to enable us to deliver the purchase. Please see their privacy policy for more information on how they handle your Personal Data.

Please see their privacy policy for more information on how they handle your Personal Data.

We also use your personal data for the following:

- Improve our marketing and communications so the information you receive is relevant to you. We will learn about you, your interests and preferences so we can improve communications in the future.
- Help us understand our visitors to the website, their motivations and behaviour to certain web pages.
- Measure and review how our followers respond to a variety of marketing activity to ensure our communications is relevant and effective.
- Undertake user research: we may contact you to ask you to participate in research online, or telephone survey or in person. You are under no obligation to participate in this research. If you do provide any further information to Laura H Drane will inform you how the research will be used.
- Analyse and continually improve the services we offer
- Ensure we keep our database accurate and up to date.
- Contact you with important information relating to the service you received from Laura H Drane, such as confirming your service order or reminding you of a networking event.

• Provide you with updates activities and courses that you might be interested in.

On the grounds that it enables us to fulfil our service and deliver our contract with you, we process the data because it is necessary for the legitimate interests we pursue as a theatre company.

This is subject to you raising an objection under your rights below requiring us to check that our interest in the processing is not overridden by the resulting risk to your rights and freedoms.

## If you have agreed for us to do so, we may:

• Send you updates via email about our projects and activities, latest news or about working with us.

You can update your personal preferences at any point and choose not to hear from us, but this may prevent us from sending you correspondence in future.

## How we collect your personal information

We collect your personal information when you interact with us. This could include, where you:

- have agreed to sign up to hear from us via our website, sign up or through a partnership project.
- sign up to receive LHDA newsletter emails from us or provide us with feedback to a project.
- o have contacted us by email, phone, post or in person
- register for special interest lists e.g. wanting to hear more about a project and surveys

#### when you visit our website:

we use cookies to help make the experience of using our website better and to
personalise the service you receive from us. This will mean that the website will
remember your previous visits and track the pages on our website that you visit.
We also look at how our audience engages with our marketing including our
Website and social media, so that we can offer the best possible experience even
where you are just trying to find out more about our latest productions. For more
information please see our Cookie Policy.

# Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy every website you visit.

#### What information do we collect?

We only collect personal information that's necessary for us to deliver our service and personal information that you have agreed to provide us to keep you informed.

#### This Personal Data includes:

- o personal information including first and last name
- contact information including current residential address, primary email address and/or primary phone number;
- card payment information, including your card details, name on your account and your billing address;
- technical information including IP address (for more information on this, please see below), operating system, browser type and related information regarding the device you used to visit the Website, the length of your visit and your interactions with the Website;
- o information obtained through our correspondence and monitoring; and
- details of any enquiries made by you through the Website, in person, or over the phone together with details relating to subsequent correspondence (if applicable).

#### Social Media

You are in control of your personal setting on social media. We will only contact you if you wish to receive messages from us depending on your permission to access information from those accounts or services.

If you make use of our Website through a social media provider, we may access information about you via that social media provider in accordance with their policies. When using social media and you have chosen to include it in your social media account, we may access information such as your name, profile picture, gender, birthday, email address, town or county and any other information you

have chosen to make available. We may also access information from social media providers about your use of an application that we run on their website.

#### **Business Personal Data**

#### Why do we collect personal information?

Laura H Drane works with a variety of people and organisations to enable it to operate. We work with a variety of artists, freelancers, trustees, different types of organisations and third-party service providers. As part of our working processes we will need to capture and process sometimes Personal Data if a separate business field is not available, and you have provided us with that information as part of a contract.

# To enable us to fulfil our service and deliver our contract with you we collect data, so we can:

- contact you regarding your contract and business agreement with us.
- process payments through our finance systems.

### If you have agreed to work with us under legitimate reasons, we will:

- contact you regarding LHDA and delivery of service
- only contact you by the permissions you have supplied

If in the future you want to cease communications, you have option to opt out or the right to be forgotten – See your Rights (below)

## How we collect this personal information?

We collect your personal information if you share this information with us part of a contract or an agreed delivery of service by LHDA or for our legitimate interests. We work with organisations and individuals some of whom provide LHDA with Personal Data as part of a business agreement such as name, contact telephone number, email, address and bank details.

#### What information do we collect?

We only collect personal information that's necessary for us to deliver our service.

If business fields are not provided, Personal Data may include name, address, email, telephone number and bank account details.

You can update your personal preferences or let us know at any point if you choose not to hear from us, but this may mean you will not receive necessary correspondence from us that allows us to perform the contract with you.

## **Our Grounds for Processing your Personal Data:**

The grounds we hold and process your Personal Data are as follows:

- Ensure that LHDAl can provide communication and service to those using the company.
- Detect and reduce fraud and credit risk we will retain data with a financial connection for up to 7 years.

# How we manage your data

Any Personal Data held by LHDA will not be shared with any third party without your consent for marketing purposes.

However, we may disclose your information (including Personal Data):

- to our business partners, service providers or third-party contractors to enable them to undertake services for us and/or on our behalf for example
  - Lloyds Bank name Processing payments
  - Accountants
  - o PayPal to pay for goods or a service directly.
  - HMRC to process information connecting to TAX and National Insurance
  - Third party organisations which supply a marketing support service such as box office, freelancers, mailing houses, website hosting providers or email delivery service.
- if we are under orders or a duty to disclose or share Personal Data to comply with any legal obligation, including (but not limited to) any request or order form law enforcement agencies and/or HMRC in connection with any investigation for the purposes of fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share Personal Data to comply with any legal obligation, including (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity; and
- to other third parties if you have specifically consented to us doing so.

All third-party service providers have gone through a Third-Party Assessment by Papertrail to ensure it meets the <u>Data Protection Guidelines Regulations</u>.

We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the Website. In such circumstances we do not disclose any information which can identify you personally.

# How we protect and store your data

LHDA takes managing Personal Data seriously and has adopted appropriate policies to ensure the information we have about you is protected.

# Marketing and opting out

- Where you are dealing with us on behalf of a limited company or LLP, for business purposes, then we may contact you by email to your corporate email address about similar or related products that we offer. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time.
- If you have given permission, we may contact you by mail, telephone and email to provide information about services and other information we think may be of interest to you. We will inform you (before collecting your data) if we intend to use your data for such purposes. If you would rather not receive such marketing information from us, or you no longer wish to receive it, you can opt out at any time.
- You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes. If you wish to exercise this right, you should contact us by sending an email to <a href="mailto!l.drane@laurahdrane.com">l.drane@laurahdrane.com</a> contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request. Alternatively, you can follow the unsubscribe instructions in emails you receive from us or them.

#### Information about other individuals

If you give us information on behalf of a third party, you confirm that the third party has appointed you to act on his/her/their behalf and has agreed that you can: give consent on his/her/their behalf to the processing of his/her/their Information; receive on his/her/their behalf any data protection notices; and give consent to the transfer of his/her/their Information abroad (if applicable).

# Your rights

If you are an individual, this section sets out your legal rights in respect of any of your Personal Data that we are holding and/or processing. If you wish to exercise any of your legal rights, you should put your request in writing to us (using our contact details below) giving us enough information to identify you and respond to your request

# You have the right to:

- Request access to information about Personal Data that we may hold and/or process about you and the purposes and extent of the processing.
- Have any inaccurate information we hold about you be corrected and/or updated.
   If any of the Information that you have provided changes, or if you become aware of any inaccuracies please let us know
- In certain circumstances to request that we delete all Personal Data we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Data for legal compliance purposes. If this is the case, we will let you know.
- In certain circumstances to request that we restrict the processing of your Personal Data, for example where the Personal Data is inaccurate or where you have objected to the processing.
- To request a copy of the Personal Data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the 'right to data portability'). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means.
- In certain circumstances to object to the processing of your Personal Data. If so, we shall stop processing your Personal Data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, because of your circumstances, you do not have the right to object to such processing then we will let you know.
- To object to direct marketing, for which see above.

#### **Complaints**

If you have any concerns about how we collect or process your information then you have the right to lodge a complaint with a supervisory authority, which for the UK is the UK Information Commissioner's Office ("ICO"). Complaints can be submitted to

the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>.

#### **IP Addresses and Cookies**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to help us monitor our engagement and delivery to you.

An IP address is a unique number which allows a computer, group of computers or another internet connected device to browse the internet. The log file records the time and date of your visit, the pages that were requested, the referring website (if provided) and your internet browser version. Using Google Analytics, we use this information to help understand audiences online; where they are from; what pages they are most interested in; how did they find out the information and how we could improve our engagement. This is statistical data about our users' browsing actions and does not identify any individual.

Please read our Cookies Policy for more information

#### **Contact Details**

By email: I.drane@laurahdrane.com

By phone: 07957 622623

Address: c/o Godfrey Wilson, 5th Floor, Mariner House, 62 Prince Street, Bristol, BS1 4OD

# **Changes to our Privacy Policy**

This policy was updated on 1 February 2021 in line with the General Data Protection Regulations.

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 e-mail.

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to <a href="mailto:l.drane@lauraHdrane.com">l.drane@lauraHdrane.com</a>

For more information on the Data Protection Act, you can call (UK) 01625 545 700 or visit the Information Commissioner's website at www.informationcommissioner.gov.uk

#### **DEFINITIONS**

References in this Policy to:

"Privacy and Data Protection Requirements" means: the Data Protection Act 1998 (until repealed) ("DPA"), the Data Protection Directive (95/46/EC) (until repealed) and, from 25 May 2018, the General Data Protection Regulation 2016/679 ("GDPR") or any equivalent provision which may replace the GDPR following the formal political separation of the United Kingdom from the European Union; the Regulation of Investigatory Powers Act 2000; the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699); the Electronic Communications Data Protection Directive (2002/58/EC); the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003); and all applicable laws and regulations which may be in force from time to time relating to the processing of Personal Data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner or any other supervisory authority, and the equivalent of any of the foregoing in any relevant jurisdiction; and

"Personal Data", "Data Controller" and "Data Processor" and "processing" shall have the meanings given to them in the DPA or, from 25 May 2018, the GDPR.

Policy updated on 24 Jan 2021

# **Cookies policy**

#### What is a cookie?

A cookie is an online file which is stored on your internet browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive from our website. A cookie allows us to monitor and deliver a better more personalised online service. Some of the cookies we use are essential for the site to operate.

A cookie does not give access to your computer or to information beyond what you provide us.

Why do we use Cookies?

- 1. This Website may place and access certain Cookies on your computer. We use Cookies to improve your experience of using the Website.
- 2. LHDA has chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 3. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 4. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling LHDAto provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

## This Website may place the following Cookies:

## Type of Cookie & Purpose

# **Analytical/performance cookies**

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

#### General

- 1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 4. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

#### **Cookies Attribution**

This privacy policy was created using a document from <a href="Rocket Lawyer">Rocket</a> (https://www.rocketlawyer.co.uk).

## Third-party cookies

#### **Advertising Cookies**

We sometimes use online cookies for targeted online advertising based on audiences who have visited our website and social media channel pages or have determined their interests and demographic through Google.

Google uses the third-party <u>DoubleClick cookie</u> to collect data and serve ads that are relevant to you on the websites of its partners. The cookie does not contain any personally-identifiable information and we do not merge it with any personally-identifiable information collected through the website. Users may opt out of the use of the DoubleClick cookie for interest-based advertising by visiting <u>Ads Settings</u>.

The features used are: Remarketing with Google Analytics, Google Display Network Impression Reporting and Google Analytics Demographics and Interest Reporting.

We use also Google Analytics' 3rd-party audience data such as age and interests to better understand your online behaviour, and we work with companies that collect

information about your activity to make sure we only talk to you about things you're interested in.

COOKIE POLICY UPDATED 27 February 2021