

# THE LONDON BALLET CIRCLE

## PRIVACY POLICY

The collection of personal information is integral to the London Ballet Circle's work as, being a Membership charity, it needs to respond to online/written enquiries and interact with various organisations.

The LBC is committed to processing data in accordance with its responsibilities in respect of General Data Protection Regulations (GDPR). These are set out in the separate Data Protection Policy.

This Privacy Policy explains the types of information/data the LBC collects about individuals, the legal basis (under data protection legislation) on which it is processed, how the information is used, and how the LBC respects people's privacy.

### 1. PROCESSING PERSONAL DATA

The LBC processes personal data as follows

Transaction	Data Collected (Key Elements)	Legal Basis
Enquiring about the LBC and its work	Name; e-mail; message (possibly address and tel.no.)	Legitimate interests – it is necessary for the LBC to read and store messages in order to be able to respond as people would expect
Enrolling as a Member or renewing Membership	Name; e-mail; address; tel.no.; payment information	Contract – the payment of a Membership Fee creates a contractual relationship between the Member and the LBC
Indicating contact preferences for Newsletters and updates	Name; e-mail; tel.no; address	Active consent on the part of the Member
Signing up for an LBC visit as a guest	Name; e-mail; tel.no; address	Active consent on the part of the guest for a specific purpose
Gift Aid declaration	Box ticked. Statement (additional to the above) made to confirm level of tax	Active consent on the part of the Member to ensure the legitimacy of the LBC's Gift Aid claims HMRC; personal and financial data (amount of subscriptions and donations) used in the LBC's accounts and to make claims
Making a donation	Name; e-mail; address; payment information	Legitimate interests – the information is necessary for the LBC to fulfil a donor's intention of giving money to the charity and for that donation to be acknowledged
Accessing the LBC Website	Website activity collected through 'cookies'	Legitimate interests – it is necessary for the LBC to store a small amount of information, usually through 'cookies', in order to deliver the kind of functionality which users would expect (for example, remembering details while someone completes the payment process)

### 2. HOW PERSONAL DATA IS USED

The LBC will only use personal data in a manner appropriate to the basis on which that data was collected, as set out in the table above. The information will therefore be used mainly to:

- send Newsletters to Members;
- provide e-mail updates to Members;
- provide information/guidance related to visits;
- reply to enquiries received by the LBC;
- make Gift Aid claims; and
- prepare LBC accounts.

Circular e-mails being sent to members by the LBC will carry the following footer: *You are being sent this information because you have opted to receive it as a member of The London Ballet Circle. Please contact The Membership Secretary ([memsec@tlbc.org.uk](mailto:memsec@tlbc.org.uk)) if you no longer wish to receive such communications.*

The LBC will only collect the minimum amount of data needed for the associated purpose and will delete that information promptly once it is no longer required.\* This applies to LBC guests participating in a visit as well as to members.[\*This is with the exception of the Gift Aid data which is required to be kept for 6 years.]

### **3. SHARING PERSONAL DATA**

The LBC will not pass data to a third party or share information about donations unless:

- a third party is being used to process data on the LBC's behalf and the LBC has a data processing agreement in place which fulfils its legal obligations in this respect;
- a donor (whose generosity will be acknowledged) has given express permission for his/her name to be revealed and/or associated with a specific charitable purpose;
- the individual concerned has given his/her explicit consent to the sharing of personal information with another named third party; or
- the LBC is required by law to share the data.

### **4. THE RIGHTS OF INDIVIDUALS OVER THEIR DATA**

Where data is collected on the basis of consent, the renewal of that consent will be sought each year in the context of Membership renewal. However, this consent may be revoked at any time by contacting the Membership Secretary\*. [If no specific contra-indication is made by the member on renewal of membership, the previous consent will continue to apply.]

Members have the right to see what data is being kept on them and/or to request the rectification or deletion of their data. [However, the deletion of an individual's data may make it impossible for the LBC to deliver some Membership services to him/her.]

Members wishing to access these rights should contact the Membership Secretary via e-mail [memsec@tlbc.org.uk](mailto:memsec@tlbc.org.uk) , approach her in person, or hand a note to any Trustee for onward delivery.

A full summary of the legal rights an individual has over his/her data is available on the Information Commissioner's website: <https://ico.org.uk> . Members also have the right to lodge a complaint with the Information Commissioner if they feel that their rights have been infringed.

### **5. WEBSITE COOKIES**

[Cookies are small files of letters and numbers which are downloaded onto the devices of people using the LBC website.]

Any cookies will be used primarily to assist the LBC in delivering the Membership functions on its website and, in this respect, the use of personal data will be for the purposes listed in Section1 (above).

**If this Privacy Policy is modified at any time, the LBC will publish the most current version on its website and notify the changes in its newsletter.**

**Approved by Trustees: 04/03/19    Last Reviewed: 14/09/20    Next Review due: March 2022 latest**