

Purpose of this privacy policy

1. Who we are

Theatre Chaplaincy UK (TCUK) is a charity registered in England and Wales, number 207315 and is a company limited by guarantee registered in England and Wales, number 215311. This privacy notice aims to give information about how TCUK collects and processes personal data. We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

2. Information we may collect about you

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed, i.e. anonymous data.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes home address, email address and telephone numbers.
- **Transaction Data** includes details about subscriptions and donations received from you.
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We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of the membership scheme for Supporting Members and Theatre Chaplain Members or as sponsors to entries in the TCUK Book of Remembrance and you fail to provide that information when requested, we may not be able to offer you any details of the work of TCUK or inform you of the upcoming events organised by TCUK or process the entry in the Book of remembrance. In this case, we may have to cancel the membership or cancel the processing of the entry in the Book of Remembrance.

3. How we collect your data

When you complete the Members Joining form or Members Renewal form, we will store the personal information you give to us such as your name, email address, postal address, telephone number and email address. We will also keep a record of your membership renewal date, method of subscription, any donation received alongside the subscription and whether a Gift Aid Form has been received. When you complete a Gift Aid Mandate we will store the personal information you give us such as your name and postal address. If you sponsor an entry into the Book of Remembrance we will store the personal information you give such as your name, postal address, telephone number and email address.

4. How we may use your information

We will only use your personal information when the law allows us to. We will use your personal information as we have a legitimate interest to do so to maintain your membership records with TCUK, maintain the Gift Aid records of TCUK and maintain the Book of Remembrance sponsors records.

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new supporter of TCUK	(a) Identity (b) Contact	Necessary for our legitimate interests as we have a business reason to use your information, so long as this is not overridden by your own rights and interests, to keep your membership records up to date.
To manage our relationship with you	(a) Identity (b) Contact	Necessary for our legitimate interests as we have a business reason to use your information, so long as this is not overridden by your own rights and interests, to keep your membership records up to date.
To register you as a Sponsor of an entry in the TCUK Book of Remembrance	(a) Identity (b) Contact	Necessary for our legitimate interests as we have a business reason to use your information, so long as this is not overridden by your own rights and interests, to keep your membership records up to date.

Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful, and never excessive. We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of email, we will give you an opportunity to opt out of receiving electronic communications by asking you to reply to any email telling us to unsubscribe you from the email list. We will then revert to postal communications in future.

5. Disclosure of your details to third parties

We may disclose your personal information to HMRC in the case you have completed a Gift Aid mandate as part of the process of reclaiming Gift Aid. In addition, we may disclose your personal information where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies or for the collation of information for accounting purposes).

We do not sell personal details to third parties for any purpose.

6. Security of your personal information

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR.

7. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. You have the right to:

a) Request access to your personal information

You have a right to request a copy of the personal information that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below.

b) Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

c) Request erasure of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons - which will be notified to you at the time of your request.

d) Object to processing of your personal information

You have the right to object to the processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e) Request restriction of processing your personal information

You have the right to request that we suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

f) Request transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

g) Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please also note the following:

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Notification of changes to our privacy policy

This privacy policy may change from time to time. We will always communicate any changes to our supporters where we have accurate contact details and where they would expect to receive communications from TCUK. Please visit the membership page of our website periodically in order to keep up to date with changes in our privacy policy.

10. Contact details and further information

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests. The TCUK Membership Secretary acts as the TCUK Data Controller as they have the membership records and keep them up to date. Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us.

Write to us:
Martin Ayres
Membership Secretary
Theatre Chaplaincy UK
St Paul's Church
Bedford street
London
WC2E 9ED

Email us: info@theatrechaplaincyuk.com

Call us: 07501 829491

If you are a European citizen and consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, i.e. the Information Commissioner's Office.

Privacy policy effective from 10 April 2018