



# JADC Privacy Policy

Last updated and approved:

25<sup>th</sup> January 2020

Next due for review and approval:

**January 2021**

## Contents

Introduction.....	3
What this Notice covers .....	3
Personal Data we Collect.....	3
How and Why We Use Personal Data .....	5
Make our Productions available to you .....	5
Manage and improve our day-to-day operations.....	5
Personalise your JADC experience.....	5
Contact and interaction with you .....	6
Marketing activities.....	6
Claims .....	6
CCTV .....	6
Sharing personal data with third parties .....	7
How do we protect personal data?.....	7
How long do we use personal data for? .....	7
Marketing and market research.....	8
Subject Access Rights .....	8
Your rights as a data subject .....	9
Complaints.....	10

## Introduction

The Jersey Amateur Dramatic Club, (JADC) (referred to as “we” or “us”) for the purpose of this notice, are the data controllers and we are pleased to provide you with the following Privacy Notice.

We are working hard to serve our members a little better every day. Looking after the personal data you share with us is a hugely important part of this. We want you to be confident that your data is safe and secure with us and understand how we use it to offer you a better and more personalised experience as an active member.

## What this Notice covers

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. That’s why we’ve developed this Privacy Policy, which:

- sets out the types of personal data that we collect;
- explains how and why we collect and use your personal data;
- explains when and why we will share personal data within the **JADC** and with other organisations; and
- explains the rights and choices you have when it comes to your personal data.

We offer a wide range of activities for our members, so we want you to be clear about what this Policy covers. This Policy applies to you as a member of the JADC. Being a member of the JADC means:

- Using any of the websites (“our Websites”) where this Policy is posted; or
- Using a member’s area of our Website;
- You become a registered member of the JADC;
- If you contact us or we contact, you about our Productions;
- If you are a committee member of the JADC; and
- Parts of this Policy also apply to our premises CCTV systems where they capture footage of you.

Our Websites **may** contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal data on another website as we do not accept any responsibility or liability for websites of other organisations.

## Personal Data we Collect

This section tells you what personal data we may collect from you when you join the JADC and what other personal data we may receive from other sources.

**When you join the JADC (Adult), you may provide us with:**

- When you complete the Adult members application form, you provide your full name, address, email address, telephone number, areas of interest and previous experience;
- When applying for a part in one of our Productions, we may ask for accessibility, dietary, health or other sensitive personal data.
- If you (or someone on your behalf) do provide such information to us, please be aware we may need to ask for your explicit consent. In some cases, it may be permissible for us to have such data as it is in your vital interests that we do so.

**When you join the JADC (Junior), you may provide us with:**

- When you complete the Junior members application form, you provide your full name, date of birth, address, email address, telephone number, areas of interest and previous experience;
- You also provide contact details of a Parent or Legal Guardian;
- When applying for a part in one of our Productions, we may ask for accessibility, dietary, health or other sensitive personal data.
- If you (or someone on your behalf) do provide such information to us, please be aware we may need to ask for your explicit consent. In some cases, it may be permissible for us to have such data as it is in your vital interests that we do so.

**When you browse our websites, we may collect:**

- Information about your online browsing behavior on our Websites and information about when you click on one of our promotions (including those shown on other organisations' websites);
- Information about any devices you have used to access our Productions (including the make and operating system, IP address, browser type and mobile device identifiers)

**When you contact us or we contact you or you take part in a Production, advertise a Production, general members communication, surveys or reviews about our Productions, we may collect:**

- Personal data you provide about yourself anytime you contact us about our Productions (for example, your name and contact details), including contacting us by phone, email or post or when you speak with us through social media;
- Details of the emails and other digital communications we send to you that you open, including any links in them that you click on; and
- Your feedback and contributions to member surveys or reviews.
- We monitor social media to respond to comments or complaints about our Productions and with the permission of the platform owner we may reproduce your comments on our website, on the lawful basis of our legitimate interests.

**When you visit our premises:**

- Images of you may be recorded on our CCTV systems;
- If you are member of the JADC, for your safety and wellbeing.

## How and Why We Use Personal Data

This section explains in detail how and why we use personal data. In order to collect and process personal data about you we need to have a lawful basis. The main Lawful bases we rely on includes consent (where you have given permission), contract (where processing is necessary for the performance of a contract with you) and our “legitimate interests” (where processing is in the interest of the JADC and we believe you would have a reasonable expectation for us to do this).

We use personal data to:

### Make our Productions available to you

We need to process your personal data so that we can manage your expectations and provide the high quality service expected at our premises and provide you with the equipment needed for our Productions.

As a member of the JADC, we use your personal data to comply with our legal obligations necessary for a club to run effectively and other obligations as a Data Controller.

### Manage and improve our day-to-day operations

#### **Manage and improve our websites**

We use cookies and similar technologies on our Websites to improve your experience. Some cookies are necessary so you should not disable these if you want to be able to use all the features of our websites. You can disable cookies, but this may affect your visitor experience. For more information about cookies and how you can disable them, see the [cookie notice here](#).

#### **Help to develop and improve our Productions, information technology systems, know-how and the way we communicate with you**

We rely on the use of personal data to carry out internal research and development, and to improve our information technology systems (including security) and our Productions. This allows us to serve you better as a committee of the JADC.

#### **Detect and prevent fraud or other crime**

It is important for us to monitor how our systems are used to detect and prevent fraud, other crimes and the misuse of membership. This helps us to make sure that you can safely use our premises and take part in our Productions.

### Personalise your JADC experience

#### **Provide you with relevant marketing communications**

We want to ensure that we provide you with marketing communications, including online advertising, that are relevant to your interests. To achieve this, we also measure your responses

to marketing communications relating to membership and Productions, which also means we can offer you updates and information that better meet your needs as a member. You can change your marketing choices, both when you join the JADC, and at any time after that. You also have choices when it comes to online advertising.

### Contact and interaction with you

#### **Contact you about our Productions**

We want to serve you better as a valued member, so we use personal data to provide clarification or assistance in response to your communications.

#### **Manage Productions you take part in.**

We need to process your personal data so that we can manage the Productions you choose to apply for.

#### **Invite you to take part in and manage member surveys, reviews and complaints**

We carry out internal research to improve our Productions. However, if we contact you about this, you do not have to take part in the activities. If you tell us that you do not want us to contact you for internal research, we will respect this choice. This will not affect your ability to take part in our Productions.

### Marketing activities

#### **We use your information for marketing activities. These activities include:**

- Using your contact information to send you news about our Productions.
- You can unsubscribe from email marketing communications quickly, easily and at any time – just click on the "Unsubscribe" link included in each email or other communication.

### Claims

#### **In order to resolve legal claims or disputes involving you or us.**

For example, if you have any accident or there is an incident at our premises or during one of our Productions. This could include medical reports.

### CCTV

#### **To monitor the safety of our premises in order to prevent and detect crime and anti-social behaviour.**

We record images using CCTV both inside and outside our premises in order to protect our Club, the local community, members and visitors. Clear signs are displayed to show its use and images recorded will be retained for a period of 7 days from recorded date. These images will be disclosed to third parties only in the event of criminal activity on the premises, a formal request

by a law enforcement agency or for internal investigations by a nominated IT Administrator and the Clubs Data Protection Advisor.

### Sharing personal data with third parties

We may on occasions pass your Personal Information to third parties exclusively to process work on our behalf. The JADC requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice.

These third parties may include IT Cloud storage agents such as Google.

We do not broker or pass on information gained from your engagement with us without your consent. However, JADC may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of our premises, committee, you as our member and/or the wider community.

### How do we protect personal data?

**We know how important it is to protect and manage your personal data. This section sets out some of the measures we have in place.**

- We apply physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data;
- We protect the security of your information while it is being transmitted by encrypting it;
- We use computer safeguards such as firewalls and data encryption to keep this data safe;
- We only authorise access to Committee Members, IT administrator and for specific reason, our data protection advisor who need it to carry out their responsibilities;
- We regularly monitor our systems for possible vulnerabilities and attacks;
- We will ask for proof of identity before we share your personal data with you.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by companies operating outside the EEA who work for us. If we do this, we ensure that your privacy rights are respected in line with this Policy.

### How long do we use personal data for?

We will not keep your personal data longer than we need to, how long this is, depends on several factors, including:

- Why we collected it in the first place;
- Whether there is a legal/regulatory reason for us to keep it; or

- Whether we need it to protect you or us.

You can at any time ask us to provide you with the retention schedule relating to your own personal data. We will provide this information in accordance with our policy and procedure for Data Subject Access Requests.

## Marketing and market research

We will send you relevant news about our Productions in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. If you are a member of the JADC we will ask if you would like to receive marketing communications, and you can change your marketing choices at any time by clicking the unsubscribe link in the footer of any marketing email, over the phone or in writing.

We also like to hear your views to help us to improve our Productions, so we may contact you for internal market research purposes. You always have the choice about whether to take part in our market research.

## Subject Access Rights

**You have the right to see the personal data we hold about you. This is called a Data Subject Access Request (DSAR).**

If you would like a copy of the personal data, we hold about you can use the on-line Data Subject Access Request Form on our websites or write to:

Secretary  
Jersey Amateur Dramatic Club (JADC)  
The Barn  
La Rue Du Trot,  
St Saviour  
Jersey  
JE2 7JQ

You can also email us at [IT@JADC.co.uk](mailto:IT@JADC.co.uk)

## Your rights as a data subject

At any point whilst we are in possession of, or processing your data, you have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you;
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete. If you believe we hold inaccurate or missing information, please let us know and we will correct it;
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records. There are several situations when you can have us delete your personal data, this includes (but is not limited to):
  - When we no longer need to keep your personal data;
  - You have successfully made a general objection;
  - You have withdrawn your consent to us using your personal data (and we do not have any other grounds to use it);
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing. There are several situations when you can restrict our use of your personal data, this includes (but is not limited to):
  - you have successfully made a general objection;
  - you are challenging the accuracy of the personal data we hold;
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation;
- **Right to object** – you have the right to object to certain types of processing such as direct marketing. If on balance, your rights outweigh our interests in using your personal data, then we will at your request either restrict our use of it or delete it;
- **Right to object to automated processing**, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling;

In the event that we refuse your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

### **To access what personal data is held, identification maybe required**

If the requestor is personally known, there is no requirement to request identification documents. If there is reasonable doubt about the identity of the requestor, then the JADC may require further information to verify the requestor's identity. We will accept the following forms of ID: a copy of your national ID card, driving license or passport. A minimum of one piece of photographic ID listed above and a supporting document is required such as a utility bill not older than three months. If we are dissatisfied with the quality of ID provided, further information may be sought before personal data can be released.

All requests should be made to IT@JADC.co.uk or in writing to us at the address further below. We will respond to your request within a four-week period, once your identification has been verified.

## Complaints

We'd like the chance to resolve any complaint you have; however, you also have the right to complain to the Office of the Information Commissioner about how we have used your personal data.

In the event that you wish to make a complaint about how your personal data is being processed by us, you have the right to complain to your Committee. If you do not get a response within 30 days or are dissatisfied with the response, you can complain to the Data Protection Commissioner.

The details for each of these contacts are:

### **JADC for the attention of the Secretary**

The Barn, La Rue du Trot, St. Saviour Jersey JE2 7JQ

IT@JADC.co.uk

### **Office of the Information Commissioner – Jersey**

2nd Floor, 5 Castle St, St Helier, Jersey JE2 3BT

Telephone +44 (0) 1534 716530 or Email: enquiries@dataci.org