

# GDPR/PRIVACY POLICY

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. GDPR does not apply to information already in the public domain.

Belfast Operatic Company takes its responsibilities in relation to your data extremely seriously and we are committed to respecting your privacy and the personal information you give us. For the purposes of GDPR Belfast Operatic Company is the Data Controller and we have appointed a Data Protection Officer who is our Secretary, Gary Redpath.

The privacy policy sets out the types of information that we hold, how we use it, the legal basis for processing your personal data, under what circumstances the data may be shared, where it is stored and how it is protected.

We encourage all members to read the privacy statement and you should contact us if you have any questions or if you have any concerns in relation to your personal information.

If we make significant changes to this policy we will take additional steps to draw this to your attention.

You should know that you have certain rights under this policy including the right to object to certain uses of your personal information. Further details are provided later in the policy.

## WHO ARE WE?

We are the Belfast Operatic Company which has over the course of sixty years established itself as one of the leading amateur musical theatre companies in Ireland. The company performs regularly in the Grand Opera House and the Ulster Hall, The Waterfront and The Mac in Belfast. The company also performs concerts in much smaller venues throughout Northern Ireland.

## WHAT LEGAL BASIS DO WE HAVE FOR PROCESSING YOUR PERSONAL DATA? / LEGITIMATE INTERESTS

A legitimate interest is when we have a business or commercial reason to use your information. It is in our legitimate interests to collect and process your personal data for a range of operational purposes which are set out through this policy and processing your personal data is necessary to achieve these operational purposes.

When we process your personal data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not process your personal data for activities where our interests are overridden by the impact on you.

## YOUR RIGHTS IN RELATION TO PERSONAL DATA

At any point whilst we hold your data, you have a number of rights available to you, including the following:

- Right of access – *you have the right to access a copy of the information that we hold about you and to obtain information about how we process it*
- Right of rectification – *you have a right to request that we correct data that we hold about you if it is inaccurate or incomplete*
- Right to be forgotten – *in certain circumstances you can ask for the data we hold about you to be erased from our records*
- Right to restriction of processing – *where certain conditions apply you have a right to request that we restrict the processing of your information*
- Right of portability – *you have the right to have the data we hold about you provided to you in an electronic format and/or to request that it is transferred to another organisation*
- Right to object – *you have the right to object to certain types of processing such as direct marketing*
- You have the right to lodge a complaint with the Information Commissioner's Office <https://ico.org.uk/>.

You can exercise these rights in the first instance by contacting our Data Protection Officer

We will process a legitimate data access request within 1 month and in most cases free of charge.

Should you wish to find out more, or to contact our Data Protection Officer, please e-mail our Secretary at: [secretary@belfastoperatic.co.uk](mailto:secretary@belfastoperatic.co.uk)



# FOR MEMBERS

The Belfast Operatic Company is committed to protecting personal information. This section relates to our use of any personal information we collect from you when you become a Member or Supporters of the Society.

Members pay a membership fee and Supporters are individuals who are involved in supporting the activities of the Society. This involvement includes (but is not limited to) scenery construction, costumes, properties, publicity, front of house arrangements, stage management, sound, lighting, direction, choreography, music and orchestra.

Supporters also include lapsed members, as such members normally wish to remain in contact with the society and may wish to renew their membership at a future date. All members and supporters consent to being added to our marketing database.

## THE PERSONAL INFORMATION WE COLLECT FROM YOU

We collect basic personal details such as your *name, address, e-mail address, telephone number, subscriptions and dates paid, standing order details*. For Members, we may also take your photograph and ask you for your biography, which may be held on file by the Secretary. Occasionally we may also collect sensitive personal information such as medical histories as it is important that we know about food allergies and conditions such as epilepsy. It is also important that we are aware of serious medical conditions in case of sudden illness during the course of a show or a concert.

## HOW WE USE INFORMATION

We will use your information to send you newsletters, letters or emails to give you details of General Meetings, Shows, Rehearsals and similar events that are likely to be of interest to you. Your name, and possibly photograph and biography, may appear in our show Programmes and newsletters.

Your information may also be shared with our committee members (who are our Society's Trustees), whereby a committee member has a legitimate use for the data. This use is in our 'Legitimate Interest'. Emergency medical details may be shared with our Production and Stage Manager.

You will be aware that our show programmes are public documents and that our newsletters are shared amongst our membership and with our supporters. We will not share your information with other third parties without your consent.

## SECURITY

We put in place reasonable security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information. Data will be held in a centralised, password protected location.

## YOUR RIGHTS

Please let us know if your information changes as it is important that the personal information we hold about you is accurate and up to date.

We will keep your information indefinitely after you remain an active member or supporter of Belfast Operatic Company. We keep your information because you may resume your connection with us and take part again in our activities. However, you can ask us to remove your personal information from our records at any time and we will do so and stop sending you any further newsletters.

You have the right to request a copy of all the personal information we hold about you in a Subject Access Request. To do this, simply write to us at the address below. We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

## CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time; for example, to keep it up to date or to comply with legal requirements. If there will be any significant changes made to the use of your personal information in a manner different from that stated, we will seek your permission first.

## HOW TO CONTACT US?

If any member of Belfast Operatic Company has questions or concerns in relation to their personal information or if they wish to lodge a complaint in relation to use of their personal information they can contact us

- by email at [secretary@belfastoperatic.co.uk](mailto:secretary@belfastoperatic.co.uk)
- by post at Heron Rd address

**GDPR  
POLICY**



EST. 1960

**BELFAST  
OPERATIC  
COMPANY**

# FOR CHILDREN

The Belfast Operatic Company is committed to protecting personal information. This section relates to our use of any personal information we collect about children who audition for or are cast in one of our productions and their parents/guardians. We collect this information from you and/or from your parents or guardians.

## THE PERSONAL INFORMATION WE COLLECT FROM YOU

Prior to the auditions, we will collect basic personal details such as your name, address, date of birth, height, parents' names, address, e-mail address and telephone number, subscription amounts and dates paid. We may also take your photograph and ask for your biography.

Prior to the auditions we will ask you and/or your parents/ guardians to consent to the collection of this personal information and the uses to which it will be put. We are able to accept consent directly from children over 13.

In accordance with EANI child in employment policy, we may ask for parental consent forms, media consent, medical history and the details of any prior performance licenses granted.

## HOW WE USE INFORMATION

We will use your personal information and your parents'/ guardians' personal information:

- for planning any aspect of the production
- to send you details of our Rehearsals and communicate with you about any aspect of the production
- to support your health and well-being whilst you are taking part in rehearsals and performances
- to comply with any legal requirements regarding your participation in the production
- and to compile entries in our show Programme
- Parent/Guardian e-mail will automatically be added to our Marketing Database.

## SECURITY

We put in place reasonable security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your personal information or your parents'/guardians' personal information. Data will be held in a centralised, password protected location.

## YOUR RIGHTS

Please let us know if your personal information or that of your parents/guardians changes as it is important that the information we hold about you is accurate and up to date. Circulating information to you and your parents/ guardians is a necessary part of being a member of the company but when the production is over, we will remove your personal information and that of your parents/guardians from our files in accordance with our Child Protection Policy, and the regulations RE licensing data as advised by the Education Authority, if appropriate. You and your parents/ guardians have the right to request a copy of all the personal information we hold about you and them in a Subject Access Request. To do this, simply write to us at the address below. We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

## CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time; for example, to keep it up to date or to comply with legal requirements. If there will be any significant changes made to the use of your personal information in a manner different from that stated, we will seek your permission first.

## HOW TO CONTACT US?

If any parent/guardian/child over 13 has questions or concerns in relation to their personal information or if they wish to lodge a complaint in relation to use of their personal information they can contact us

- by email at [secretary@belfastoperatic.co.uk](mailto:secretary@belfastoperatic.co.uk)
- by post at Heron Rd address

**GDPR  
POLICY**



EST. 1960

**BELFAST  
OPERATIC  
COMPANY**

# FOR AUDIENCE

The Belfast Operatic Company is committed to protecting personal information. This section relates to our use of any personal information we collect from you when you come to one of our productions and join our mailing list.

## THE PERSONAL INFORMATION WE COLLECT FROM YOU

We collect basic personal details such as your name, address, e-mail address, telephone number

## HOW WE USE INFORMATION

We will use your information to tell you about our forthcoming shows and similar events that are likely to be of interest to you. This is called 'Legitimate Interest'. We will not share your information with third parties without your consent

## SECURITY

We put in place reasonable security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information. Our Marketing mailing list is stored on a password protected e-mail service in the cloud.

## YOUR RIGHTS

Please let us know if your information changes as it is important that the information we hold about you is accurate and up to date. You are on our mailing list because you have been to one of our productions or have expressed an interest in them. Circulating information to you is a necessary part of promoting our productions but you can ask us to stop sending you this information and remove your details from our files at any time.

You have the right to request a copy of all the personal information we hold about you in a Subject Access Request. To do this, simply contact our Secretary. We will take reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

## CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time; for example, to keep it up to date or to comply with legal requirements. If there will be any significant changes made to the use of your personal information in a manner different from that stated, we will seek your permission first.

## HOW TO CONTACT US?

If you have any questions or concerns in relation to your personal information or if you wish to lodge a complaint in relation to use of personal information, you can contact us:

- by email at [secretary@belfastoperatic.co.uk](mailto:secretary@belfastoperatic.co.uk)
- by post at Heron Rd address

**GDPR  
POLICY**



EST. 1960

**BELFAST  
OPERATIC  
COMPANY**

# FOR SUPPLIERS

The Belfast Operatic Company is committed to protecting personal information. This section relates to our use of any personal information we collect when you become a Supplier to the Belfast Operatic Company. Suppliers in this context means personal information we may collect when you provide products or services to the Company.

## THE PERSONAL INFORMATION WE COLLECT FROM YOU

We collect basic personal details such as your name, address, company name, bank details, e-mail address, telephone number.

## HOW WE USE INFORMATION

We will use your information to invite you to provide services to the Belfast Operatic Company and to pay for your services. This use is in our 'Legitimate Interest' because we will need to contact you when we request your products or services. We will not share your information with other third parties without your consent.

## SECURITY

We put in place reasonable security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

## YOUR RIGHTS

Please let us know if your information changes as it is important that the personal information we hold about you is accurate and up to date. We will keep your information indefinitely after you remain an active Supplier to Belfast Operatic Company. We keep your information because we or you may wish to resume your connection with our group. However, you can ask us to remove your personal information from our records at any time and we will do so.

You have the right to request a copy of all the personal information we hold about you in a Subject Access Request. To do this, simply write to our Secretary. We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

## CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time; for example, to keep it up to date or to comply with legal requirements. If there will be any significant changes made to the use of your personal information in a manner different from that stated, we will seek your permission.

## HOW TO CONTACT US?

If you have any questions or concerns in relation to your personal information or if you wish to lodge a complaint in relation to use of personal information, you can contact us:

- by email at [secretary@belfastoperatic.co.uk](mailto:secretary@belfastoperatic.co.uk)
- by post at Heron Rd address

**GDPR  
POLICY**



**BELFAST  
OPERATIC  
COMPANY**

# FOR TRUSTEES

The Belfast Operatic Company is committed to protecting personal information. This section relates to our use of any personal information we collect when you become a Trustee of the Society. Trustees are elected at General Meeting or a limited additional number may be co-opted by the other Trustees

## THE PERSONAL INFORMATION WE COLLECT FROM YOU

In addition to your membership data, we hold the date of birth and home address of Trustees as this is a requirement when lodging our annual report with the Charity Commission.

## HOW WE USE INFORMATION

Your name will appear in our Report and Accounts which are filed with the Charity Commission and Companies House. We will use your information to inform you of Committee Meetings and your name will appear in the minutes of these Meetings and in the minutes of General Meetings.

## SECURITY

We put in place reasonable security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

## YOUR RIGHTS

Please let us know if your information changes as it is important that the personal information we hold about you is accurate and up to date.

We will keep your information as a Trustee until you cease to become a Trustee but you will be aware that your name will appear on our Report and Accounts which is a public document.

You have the right to request a copy of all the personal information we hold about you in a Subject Access Request. To do this, simply write to us at the address below. We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

## CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time; for example, to keep it up to date or to comply with legal requirements. If there will be any significant changes made to the use of your personal information in a manner different from that stated, we will seek your permission.

## HOW TO CONTACT US?

If you have any questions or concerns in relation to your personal information or if you wish to lodge a complaint in relation to use of personal information, you can contact us:

- by email at [secretary@belfastoperatic.co.uk](mailto:secretary@belfastoperatic.co.uk)
- by post at Heron Rd address

**GDPR  
POLICY**



EST. 1960

**BELFAST  
OPERATIC  
COMPANY**