



BEEE CREATIVE

Dance connections in Herts & Beds

Welcome to BEEE Creative CIO's privacy policy.

BEEE Creative CIO respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Purpose of this privacy policy

This privacy policy aims to give you information on how BEEE Creative CIO collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or purchase a product or service.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CHILDREN AND YOUNG ADULTS

Parts of our website may be used by children and younger people. We want our younger audience to know that you can always:

- **ask us for a copy of the information we have about you;**
- **ask us to update the information we have about you;**
- **ask us to delete the information we have about you**

BEEE Creative CIO will always:

- **follow the law on how we can keep and use the information we have about you; and**
- **make sure our policies are the best they can be.**

We will never:

- **give the information we have about you to anyone else, unless you tell us we can, we think that doing so will protect you from harm or because the law says we have to (e.g. to prevent a crime).**
- **tell people about our work with you in a way that you can be identified, unless you have told us we can.**

Who we are

BEEE Creative CIO is a Charitable Incorporated Organisation registered in England and Wales with charity number 1192065 and is the data controller responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

Contact details

If you have any questions about this privacy policy, our application of it, or wish to make any requests to exercise your legal rights, please contact:

BEEE Creative CIO, 63A George Street, Maulden, Bedford, MK45 2DD

Email address: carrie@beee-creative.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 13 July 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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 of every website you visit.

1. THE DATA WE COLLECT ABOUT YOU

Personal data, or 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 (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you including the following: **name, date of birth, age, gender, address, email address, telephone number, photographs or video recordings of you at our events or activities, details of services you have purchased from us or events and activities you have attended, information about how you use and access our website, data you provide on your interests, feedback and preferences including marketing and communications preferences.**

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we do report aggregated information to funding organisations such as Arts Council England. This aggregated data may include information about your geographical location, age, ethnicity, or sexuality but will not identify you. You are not obliged to provide Auto Italia with this information.

If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We will only collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, trade union membership, and information about your health,) or information about criminal convictions and offences, if:

- you are applying to work with or volunteer for us, in order for us to meet our legal obligations.
- we need to have information about your health in order for you to safely participate in our events, in which case we will ask for your consent to process that data.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply to participate in our projects or use our services;
 - subscribe to our newsletter;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Attendance at our sites or events** where you may be photographed or recorded
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect data about your equipment, browsing actions and patterns of use. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as:
 - External service providers of box office services, or analytical services;
 - Website analytics and search engine providers;
 - Public sources such as Companies House and the Electoral Register.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need the data in order to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests by contacting us.

- Where we need to use your data to comply with a legal obligation we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. We will also obtain your consent to use any identifiable images of you. You have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your personal data

The table sets out the main purposes for which BEEE Creative CIO collects your personal data, and the lawful basis on which we process it:

Activity	Basis for processing
To enable you to register for our events, projects or programmes	Performance of a contract Necessary for our legitimate interests (to meet our charitable objectives and benefit the public) Consent (for health data only)
To provide the services or information that you have requested	Performance of a contract Necessary for our legitimate interests (to meet our charitable objectives and benefit the public) Consent (for health data only)
To manage payments and receive donations (including processing Gift Aid claims)	Performance of a contract Necessary for our legitimate interests (to meet our charitable objectives and benefit the public) To meet our legal obligations
To administer the charity, including managing our relationship with you	Performance of a contract Necessary for our legitimate interests (to meet our charitable objectives and benefit the public) To meet our legal obligations with regards staff and volunteers
To promote and market our activities to the community we serve	Necessary for our legitimate interests (to meet our charitable objectives and benefit the public)
To gather feedback and improve our understanding of our audiences to enhance our work.	Necessary for our legitimate interests (to meet our charitable objectives and benefit the public)
To further our charitable purposes, including fundraising activities	Necessary for our legitimate interests (to meet our charitable objectives and benefit the public)

Note that we may process your personal data for more than one lawful ground depending on the purpose for which we are using your data. Please contact us if you need further information.

Marketing Communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use the data we have stored about you, such as the events you have previously attended and any preferences you have told us about. We may contact you by post, email,

phone and/or SMS with news and information about our services, events and activities that we feel may be of interest to you. We will not use your personal information for these purposes if you have told us that you do not wish to be contacted.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party (for example, named visiting companies whose performances you have attended) for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time. We will provide you with an option to unsubscribe in every email we send you, and you can contact us on the details above if you wish to opt out of postal or other marketing communications.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of other interactions you have made with our services or events.

Cookies

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function as well to provide website operators with information on how the site is being used. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more information about the cookies we use, please see: <http://beee-creative-cio.uk/cookies/>

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. DISCLOSURES OF YOUR PERSONAL DATA

Where necessary, we may share your personal data with:

- HM Revenue & Customs, regulators and other authorities, and our professional advisers including lawyers, bankers, auditors and insurers within the EEA;
- Our suppliers and sub contractors, within or outside the EEA, where they require access to your personal data to fulfil our requirements or where we have your consent to share your details for the purposes of third party marketing;
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

Some of the external third party service providers we use (including Dropbox, Google Workspace, Mailchimp, Vimeo and Zoom) are based outside the UK so their processing of your personal data may involve a transfer of data outside the UK. You can find more information on how these companies handle your personal data on their websites.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- We may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you require further information.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

If you apply to work or volunteer for BEEE Creative CIO we will use the information you supply to us to process your application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from Disclosure Scotland or the Disclosure and Barring Service, we will not do so without informing you beforehand.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, after which it will be destroyed, unless you have asked us to destroy it earlier or allowed us to retain it for longer by written request.

In some circumstances you can ask us to delete your data. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

No fee usually required You will not have to pay a fee to access your personal data (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 could 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 data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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 could 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.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) 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.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. 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.

Withdraw consent at any time where we are relying on consent to process your personal data. 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.

9. POLICY REVIEW DATE

Policy agreed and signed off in July 2021

Policy review July 2023