

**BUXTON OPERA HOUSE  
& PAVILION ARTS CENTRE**

## **Privacy Statement 2023**

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### **Contents**

Purpose of policy .....	1
Who we are .....	1
Information collection .....	2
Information you give us .....	2
Information about your interactions with us .....	2
Information from third parties .....	2
Sensitive personal data .....	2
Legal basis	
Contract purposes .....	2
Legitimate business interests .....	3
With your explicit consent .....	3
Marketing communications .....	3
Fundraising Communications .....	3
Other processing activities .....	3
Third parties .....	4
Cookies and Pixels .....	5
Your debit and credit card information .....	5
Maintaining your personal information .....	5
Security of your personal information .....	6
Your rights to your personal information .....	6
Contact details and further information .....	6

### **Purpose of Policy**

We are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop a better understanding of our customers and in turn to provide you with relevant and timely information about the work that we do - both on and off stage. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we collect and use the information we collect from you directly and from third parties.

We use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What information we may collect about you
- How we may use that information

- In what situations we may disclose your details to third parties
- Our use of cookies to improve your use of our website
- Information about how we keep your personal information secure, how we maintain it, and your rights to be able to access it

If you have any queries about this policy, please contact Customer Service at High Peak Theatre Trust or email: [customerservice@boh.org.uk](mailto:customerservice@boh.org.uk)

## Who we are

High Peak Theatre Trust is a charity that runs Buxton Opera House, Pavilion Arts Centre and Buxton Cinema. The business is funded by box office income, a grant from High Peak Borough Council and individual donors and supporters. Our registered charity number in England and Wales is 507354 and we are also registered as a company in England and Wales under registration number 1356378.

## Information Collection

We collect various types of information and in a number of ways:

### Information you give us

For example, when you register on our website, buy tickets, join one of our Learning & Participation groups or make a donation, we'll store personal information you give us such as your name, email address, postal address, telephone number and card details. We will also store a record of your purchases and donations.

### Information about your interactions with us

For example, when you visit our website, we collect information about how you interact with our content and ads. When we send you a mailing, we store a record of this, and in the case of emails we keep a record of which ones you have opened, and which links you have clicked on.

### Information from third parties

We occasionally receive information about you from third parties. For example, we may use third party research companies to provide general information about you, compiled using publicly available data.

### Sensitive personal data

Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about our customers unless there is a clear reason for doing so, for example we collect health information about participants in our Learning & Participation programme.

## Legal Basis

There are three bases under which we may process your data:

### Contract purposes

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract, we need to process and store your data. For example, we may need to contact you by email or telephone in the case of cancellation of a show, or in the case of problems with your payment.

### **Legitimate business interests**

In certain situations, we collect and process your personal data for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing.

### **With your explicit consent**

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

## **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 data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. In the case of email, we will give you an opportunity to opt out of receiving them during your first purchase with us. If you don't opt out, we will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy. We may also contact you about our work by telephone, however we will always check with the Telephone Preference Service beforehand.

## **Fundraising Communications**

We share our fundraising messages with you in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as previous donations.

We use our legitimate organisational interest as the legal basis for fundraising communications by post. You may object to receiving these at any time using the contact details at the end of this policy. In the case of email, we will ask for your specific permission to contact you about our fundraising work. If you agree to email communications, we will still give you the opportunity to unsubscribe in every email that we subsequently send you, or you can contact us to change your preferences.

We may also contact you about our work by telephone, however we will always check with the Telephone Preference Service beforehand.

## **Other Processing Activities**

In addition, we also process personal information in the following ways that are within our legitimate organisational interests:

- We may analyse data we hold about you in order to identify and prevent fraud.
- In order to improve our website, we may analyse information about how you use our website and the content and advertising that you interact with.

- We may use profiling techniques or third-party wealth screening and insight companies to provide us with information about you that will help us to communicate in a relevant way with you, in particular when we are approaching you about potential philanthropic support. Such information is compiled using publicly available data about you.
- We have CCTV in place throughout our venues for the purposes of crime prevention and public safety. This footage is only accessed for technical reasons and post-incident.

In all the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental rights and freedoms. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

## Third Parties

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our own service providers who process data on our behalf and on our instructions, for example our ticketing system software provider, our refund protection provider and IT provider. In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.
- 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.
- With other organisations, particularly [Illuminate](#), [The Audience Agency](#), and [UK Theatre](#) who use this data to analyse ticket sales for national and regional research into patterns of Arts attendance in England. This assists with reporting to funders and strategic planning, helping us to make better business decisions. Your personal data is never used by them to contact you, nor passed or sold on to any other agencies or companies, and we have agreements in place to ensure this.
- We use Counting What Counts (CWC) as our Processor to power selected evaluations each year. We have signed a legally binding agreement with Arts Council England confirming CWC will only collect and store information about you according to our instructions, based on how we use their self-serve platform. CWC has taken steps to minimise the amount of personal data it can see or access when processing on our behalf and to make sure it's appropriately secured. See the CWC [Privacy Policy](#).
- To specific named visiting companies whose performances you have attended. In these cases, we will always ask for your explicit consent to share your contact details before doing so. These partner companies may contact you by email, post or telephone using the contact information that you have agreed to share. You can amend your contact preferences directly with these companies.
- Where you have donated money to a fundraising campaign, we will share details about you and your donation with the campaign organisers so that they can contact you about their fundraising activities.
- We hold a data sharing agreement with Buxton International Festival in which we are Joint Data Controllers of Buxton International Festival Data. Where you have booked tickets for a performance from Buxton International Festival or donated to Buxton International Festival, we will pass your contact, booking and donation details, so that they can contact you about their activities. The legal reason for this being Legitimate Business Interest and Contractual Purposes. They will contact you directly to inform you of their own data policies and set out how you can opt out of their communications should you choose to.

## Cookies and Pixels

Cookies are small text file of letters and numbers that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well to provide website operators with information on how the site is being used. A cookie isn't a computer program, can't read files on your computer, can't carry viruses and can't install malware onto your computer.

We use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we can make.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

Cookies you may encounter on Buxton Opera House:

**Craft:**

*CraftSessionID, #####username*

The content management system (Craft) used to power this site, uses cookies to help you navigate, and to remember any preferences you have and pages you've already visited.

**Google Analytics:**

*\_\_utma \_\_utmb \_\_utmc \_\_utmz \_\_utmz \_\_utmxx \_\_ga\_gat*

Used by Google Analytics allowing us to track pages you visit, and basic details about your web browsers. They cannot identify you personally. Google Analytics retains some data that can identify you as a returning user to the site. This data is purged after a maximum of 26 months after your first visit.

**Google Maps:**

*APISID HSID NID PREF SAPISID SID SS SSID*

Used by Google Maps to remember your preferences e.g., zoom and position.

**Facebook Tracking Pixels:**

We use Facebook tracking pixels to generate data about our website visitors. Pixels does not collect personally identifiable information. We use this data to target visitors through Facebook advertising.

**Spektrix:**

*ASP.NET\_SessionId, SpektrixClientName*

Used by Spektrix, the booking platform allowing you to purchase tickets. Spektrix cookies allow you to login, add multiple items to a shopping cart before purchasing tickets, merchandise and making donations.

For further information about these cookies or any other cookies found within this site, please contact: [customerservices@boh.org.uk](mailto:customerservices@boh.org.uk)

By browsing Buxton Opera House, you are accepting the cookies as mentioned above plus any others deemed essential for the best user experience. You can manage cookies in your browser; however, if you decline or delete cookies, areas of the site may not function properly or may behave unexpectedly.

## **Your Debit and Credit Card Information**

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard here: [www.pcisecuritystandards.org](http://www.pcisecuritystandards.org).

We optionally allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS and in a way where none of our staff members can see your full card number. We never store your 3- or 4-digit security code.

## **Maintaining your personal information**

We store your personal information indefinitely such that for any subsequent purchases you make we can link them back to a single unique record that we hold for you on our system.

If there are aspects of your record that are inaccurate or that you would like to remove, you can usually do this by logging in to your account through our website. Alternatively, please use the contact details at the end of this policy.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

## **Security of your personal information**

We will 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 ensure that any third parties we use for processing your personal information do the same.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area.

## **Your rights to your personal information**

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the end of this policy if you would like to exercise this right.

## **Contact details and further information**

Please get in touch with us if you have any questions about any aspect of this privacy policy, or if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

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