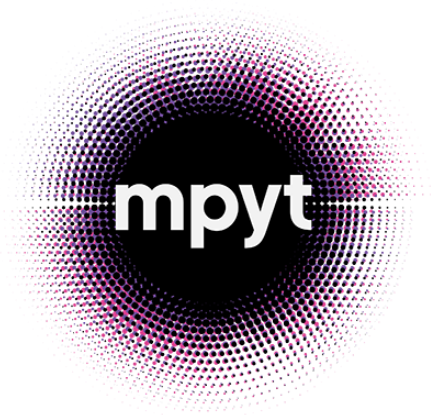




# Privacy and Data Protection Policy and Guidelines

## Purpose

Mid Powys Youth Theatre is committed to protecting your data and privacy. This Privacy and Data Protection policy sets out how Mid Powys Youth Theatre uses and protects any information that you give to Mid Powys Youth Theatre when you interact with our services. Should we ask you to provide any information by which you can be identified, then you can be assured that it will only be used in accordance with this policy which adheres to General Data Protection Regulation (GDPR) 2018.

Mid Powys Youth Theatre may change this policy from time to time. It is recommended that you check [www.mpyt.co.uk](http://www.mpyt.co.uk) regularly for any changes to our policies (<https://www.mpyt.co.uk/business-policies>)

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## Use of personal data

Mid Powys Youth Theatre (MPYT), holds personal data on a variety of individuals including:

- Those who have registered as a member of MPYT.
- Other individuals and organisations with an interest in the organisations.
- Prospective, current and former staff.
- Suppliers.
- Theatre, charity and funding contacts.
- Volunteers.

This data is held in both electronic and paper-based formats. MPYT recognises that personal information must be dealt with properly irrespective of how it is collected, recorded, used and disposed of and this policy adheres to the safeguards enshrined in the Data Protection Act 2018. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

This policy offers guidelines for employees of MPYT in respect of accessing and handling any data in their conduct of the normal business management or employment matters on behalf of MPYT.

All paid staff and volunteers will be made aware of this policy and related procedures as part of their induction. This policy will be made freely available to all MPYT users via our website or on request.

## Data we collect

1. MPYT Trustees
2. People who work and volunteer with MPYT
3. MPYT Members
4. People who buy tickets for performances

5. Website visitors

Information is received and stored whenever an individual uses the MPYT website ([www.mpyt.co.uk](http://www.mpyt.co.uk)). Cookies are used to help analyse web traffic and remember information about individuals with the purpose of providing users with a tailored web experience. MPYT will only use this for statistical analysis purposes and then the data is removed from the system. MPYT's use of

cookies will be clearly stated when an individual accesses the website for the first time. All individuals will be able to control the use of personal data collected through cookies by either providing consent or 'opting out' of any non-essential (optional) cookies. Additional information will be provided to users with further steps to control cookie collection.

MPYT may also obtain personal information when an individual uses the contact us form to communicate with the MPYT team.

The personal information that we collect includes:

- First name
- Last name
- Email address
- Telephone
- Any other personal information the individual provides in their message.

## **Data Protection Principles**

MPYT will hold the minimum personal information necessary to enable it to perform its functions. All such information is confidential and needs to be treated with care to comply with the law.

All information held by MPYT pertaining to individuals or organisations will be:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

In addition, MPYT will ensure that:

- anyone that wants to make enquiries about handling personal information knows how to do so
- employees managing and handling personal information understand they are responsible for following good data protection practice and are appropriately supervised and trained to do so
- methods of handling personal information are clearly described
- queries about handling personal information are dealt with promptly and courteously.

The Artistic Director will have responsibility for the day-to-day handling of personal information held by MPYT.

## **Consent**

MPYT seeks to use personal data only for the purposes of legitimate interests and, where practicable, with consent. Individuals have the right to know what personal data MPYT holds about them and for this to be correct. (Please see the “accessing personal data” section for more information)

It is a condition of employment that staff employed by MPYT consent to the processing of their personal data. This will be stated clearly in their contract and by signing they signify their agreement. For other individuals and registered groups, MPYT may gather data during the course of its normal activities. It will be used only for legitimate purposes.

## **Sensitive personal data**

MPYT recognises that sometimes it is necessary to process sensitive information to ensure it can operate policies on matters such as sick pay, equal opportunities and the protection of the health and safety of the individual. Because this information is considered sensitive, and it is recognised that the processing of it may cause particular concern or distress to individuals, employees and others affected will be asked to give express consent for MPYT to do this. Examples of sensitive information include:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

There are separate safeguards for personal data relating to criminal convictions and offences.

## **Individuals' Rights**

Under the Data Protection Act 2018 individuals have the right to find out what information MPYT has stored. These include the right to:

- be informed about how data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of data
- data portability (allowing the reuse your data for different services)
- object to how data is processed in certain circumstances

An individual also has rights should MPYT use personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict behaviour or interests

## **Third party access**

Third parties given access to the organisation's data must demonstrate compliance with MPYT's Data Protection policies. If appropriate, MPYT will require third parties to sign a confidentiality declaration. Third party access is not to be entered into lightly and must never be done without authorisation from the Artistic Director.

## **Accessing personal data**

Individuals have the right to see the personal data that MPYT holds about them and for that data to be corrected if it is wrong. Minor requests may be dealt with informally in the course of normal administration, at the discretion of MPYT.

Formal requests for access, modification or erasure of personal data should be made in writing to the Artistic Director of MPYT.

## Acronyms

|      |                                    |
|------|------------------------------------|
| MPYT | Mid Powys Youth Theatre            |
| GDPR | General Data Protection Regulation |

This policy will be reviewed by the board at least once bi-annually.

| Version No. | Approved By | Approval Date | Main Changes              | Review Period        |
|-------------|-------------|---------------|---------------------------|----------------------|
| 1.0         | Board       | March 2024    | New draft approved        | At least bi-annually |
| 2.0         |             | April 2025    | Reviewed, no changes made | 2 years              |