

Privacy Policy – General

Complicité is committed to protecting your personal data and being transparent about the data it holds about you. The purpose of this policy is to explain how Complicité collects, uses and protects any data we collect from you directly and from third parties.

You can opt out of any or all of our communications at any point by simply contacting email@complicite.org. Using personal data allows us to develop a better understanding of everyone who engages with us and in turn to provide you with relevant and timely information about the work that we do — both on and off stage.

We use your data strictly in accordance with all applicable laws concerning the protection of personal data and you can be assured that any data provided will only be used in accordance with this privacy policy.

This policy explains:

- Who we are
- What data we may collect about you and when
- How we may use your data
- In what situations we may disclose your data to third parties
- How we protect your data
- How you can access your data
- Our use of cookies to improve your use of our website

Who we are

Theatre de Complicite Education Limited (Complicité) is a charitable company limited by guarantee incorporated in England and Wales (Company Number 02625105) and a Registered Charity (number 1012507). Complicité is the data controller of your personal information. Registered office is 14 Anglers Lane, London, NW5 3DG and contact telephone number is +44 (0)20 7485 7700. If you have any questions regarding your data or its use, please contact our Data Protection Manager by email admin@complicite.org or by phone +44 (0)20 7485 7700.

What data we may collect and when

We collect personal data when you:

- Subscribe to our emailing list via the website – name and email address
- Join our membership scheme and/or make donation – name, telephone number, email and postal addresses, gift aid preference (unless requested to remain anonymous)
- Attend a fundraising or supporters' event - name, email and postal address

- Respond to a survey – response data
- Purchase merchandise via our website – name, email address, transaction and order details
- Apply for a workshop – name, telephone number, email and postal address
- Respond to a casting notice – name, telephone number, email and postal address
- Apply for a job or intern/work experience vacancy – your name, contact details including telephone number, email and postal address, details of your qualifications and educational history
- Visit our website – your IP address, geo-location, details of your behaviour and actions, cookies related to site performance and advertising. Information on how we use cookies on our website can be found in our Cookies Policy

We may also collect the following data from third parties:

- Depending on your privacy settings, you may provide permission to collect data from social media and online services such as Facebook, Twitter, YouTube and Google.
- When conducting fundraising research, use publicly available data about you for example, from LinkedIn, Companies House, Charity Commission and legitimate media sources.

Sensitive personal data

On occasion, and only when there is a clear reason to do so, we may collect additional data, which will be anonymised and would not be linked back to a specific individual. This could include sensitive personal data, recognised under Data Protection law as information about health, ethnicity, religious beliefs and political opinions. We may request this information to adapt the work environment for new employees or to analyse data required for funders.

How we may use your data

We only collect data that we need in order to carry out our business and to provide a service or carry out a contract with you. For example:

- To fulfil merchandise, donation and membership requests
- To provide the best possible customer services and to help us with internal administration
- To contact you with important information relating to a purchase
- To send customised online marketing (if applicable)
- To send information about fundraising campaigns and how you can support Complicité (subject to consent)

Legal basis

The basis under which we process any data could be one of three ways, see examples below:

- **Contract Basis**
When you make a donation, a purchase, book a workshop or apply for a job 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 problems with a purchase or payment.
- **Legitimate Interest**
In certain situations, we collect and process your personal data for purposes that are in our legitimate organisational interests. However, we only do so if there is no overriding prejudice to you by using your personal data in this way. For example; to manage and administer our relationship with you, such as keeping our database up to date and renewing your membership; to alert you to opportunities to support Complicité, to invite you to a fundraising event; to analyse the use of our services so that we can improve your experience.
- **Consent**
Consent is explicitly requested to send you updates via email about what's on, offers and news or about supporting us. For any other situation where the above two bases are not appropriate, we will instead ask for your explicit consent before using your personal data in that specific situation.

Third Parties

We may share your details with trusted service providers who are authorised to act on our behalf in performance of a contract we enter into with them or you, for example payment processing, database services, website hosting or email communication providers.

We require all other organisations with whom we share your personal data to respect the security of your data and to treat it in accordance with the law. We do not allow our service providers to use your personal data for their own purposes.

Other than as expressly set out in this Privacy Policy, we will not sell, rent, trade or distribute your personal data to third parties without your express consent or are required by law to do so.

We will collect and aggregate on an anonymous basis information about you and your use of our services with information about other users of our services, such as statistical or demographic data, for analysis, reporting to stakeholders (such as Arts Council

England) and to better understand our customers. For example, we may aggregate mailing list data to calculate the percentage of users accessing a specific feature on our website. However, if we combine or connect any of this type of 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 notice.

How we protect your data

We are committed to protecting the personal data you entrust to us. We adopt robust and appropriate technologies and policies, so the data we have about you is protected from unauthorized access and improper use. As part of the services offered to you through our website, the personal data you provide may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if any of the computer servers used to host the website are located in a country outside of the EEA. If we transfer your personal data outside of the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this privacy notice. We may transfer your data to the USA to organizations such as Facebook, Google or Mailchimp. The USA has weaker data protection laws than that of the EEA and therefore we will ensure that only organisations that are part of the EU Privacy Shield Initiative will handle your personal data. More details on this certification can be found at www.privacyshield.gov.

We will keep your data only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal obligations. We will not keep more data than we need. The retention period will vary according to the purpose, for example if you have made a purchase via our website then your details are retained for 28 days until the sale is complete and no returns required, alternatively if you made a donation then we will hold your details until notified by you.

Where your data is no longer required, we will ensure it is disposed of, deleted or cached in a secure manner.

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 (for example keep track of your basket) as well as providing website operators with information on how the site is being used. We use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we could make. You can read our cookies policy here.

How you can access your data

You may request details of the personal data we hold about you under the General Data Protection Regulation. If you would like a copy of the data held please send a description of the data you would like to see, together with proof of your identity to admin@complicite.org. The accuracy of your personal data is important to us and you can help keep our records up to date by telling us when your contact details and other personal data changes, and if you change your mind about how we contact you. If you would like to update the details we hold or change your contact preferences please email admin@complicite.org. You can opt out of email marketing at any time by clicking the unsubscribe link included at the bottom of every email.

Updates or changes to the Privacy Policy

This notice was updated on [date]. It may be updated to take into account changes at Complicité or for example to reflect changes to regulation or legislation.

Fundraising

Use of data and personal information for fundraising purposes

We are a registered charity and rely on fundraising to enable us to create unique artistic exchanges with world-leading artists and share these with the widest range of audiences and participants in the UK and internationally.

We are committed to fundraising best practice and abide by the Fundraising Regulator's key principles and behaviours of a fundraising organisation: to be legal, open, honest and respectful. We undertake to comply with relevant law and regulations, including the Proceeds of Crime Act, Data Protection, Tax and Gift Aid legislation and Charity Commission guidance.

We collect personal information that is necessary to carry out our fundraising activities, process donations, and keep supporters informed about Complicité and its projects.

We collect personal information that you may provide to us when you:

- make a donation or complete a Gift Aid declaration;
- complete a membership joining or renewal form;
- respond to an invitation or attend an event hosted by Complicité; or
- are in correspondence or verbal conversation about a donation with a member of our Board of staff team.

We may collect special categories of information about members, donors, and potential supporters. We will only do this in specific circumstances where there is a clear reason

for doing so, such as accessibility or dietary requirements for events, or due diligence in respect of major donations.

In relation to some members, donors, and potential supporters we may collect publicly available information about you to assist us with our activities (See: Prospect Research’).

How we use personal information to support our fundraising efforts

In addition to the personal information listed in our Privacy Policy, we will only process the following additional personal information about our members, donors, or potential supporters if we have a legal basis for doing so under current UK data protection law:

- Processing your information because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract, for example:
 - to process payments;
 - to provide you with members’ benefits, which members are contractually entitled to receive; or
 - in relation to donations, to credit you in whatever way we have agreed to do.

- Where processing your information is necessary for our legitimate interests, for example:
 - to process donations;
 - when we carry out analysis and research of members, donors, or potential supporters to gain a better understanding of our existing and potential supporters. This enables us to raise funds for our charitable purposes more effectively and efficiently, and allows us to approach supporters in a targeted and informed way about projects or activities they may be interested in supporting. See: Prospect Research; and
 - when we carry out due diligence in advance of soliciting or accepting donations in order to make sure we do not accept gifts from sources which could harm the reputation of Complicité.

Where we are relying on this basis of processing you have the right to object to this.

We will not sell your personal information to any third parties or external organisations.

Current donors

We ask all individual supporters and those who have made donations for their consent for us to email them specific fundraising email communications and project updates; to email them invitations as per the benefits; and for permission or preference for accreditation in programmes, online in our annual review and on our website. We respect the rights to anonymity if the donor so requests.

If you wish to receive fundraising communications via email, we encourage you to sign up to our mailing list or by sending us an email outlining your consent to admin@complicite.org or calling 020 7485 7700. We respect anyone's right to withdraw their consent from this form of electronic communication and once informed of a preference change, we will cease this form of contact.

Prospect Research

We undertake in-house research and from time to time engage specialist agencies or individuals to gather information from publicly available sources in order to identify potential supporters and their interests, in addition to those of our current supporters, aiding us in our fundraising activities.

As part of this, we may collect publicly available information to create a profile of your interests, preferences, and level of potential donations, so we can contact you in the most appropriate way and with the most relevant information. This may include gift history, geographic, demographic, and other information you have provided.

Sources of publicly available information include Companies House, The Charity Commission, 192.com (UK Electoral Roll and Directory Enquiries), as well as official websites of companies, charities and other arts organisations and information that has been published in articles/newspapers.

If we have identified a specific company or trust and foundation through this research that we believe may be interested in supporting our work, we may contact the people specifically connected to these bodies via publicly available contact information, such as a relevant work email address. If we identify an individual, we may contact them via phone or by post. As a charity, we believe that this is in the legitimate interest of our fundraising needs. We will always ensure we conduct an appropriate legitimate interest assessment to ensure that we are not infringing on your rights.

If you become aware that your details have been included in our Prospect Research and would prefer us not to use your data in this way, please email us at admin@complicite.org or call us on 020 7485 7700.