

Complicité

PRIVACY / GDPR POLICY

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 admin@complicite.org

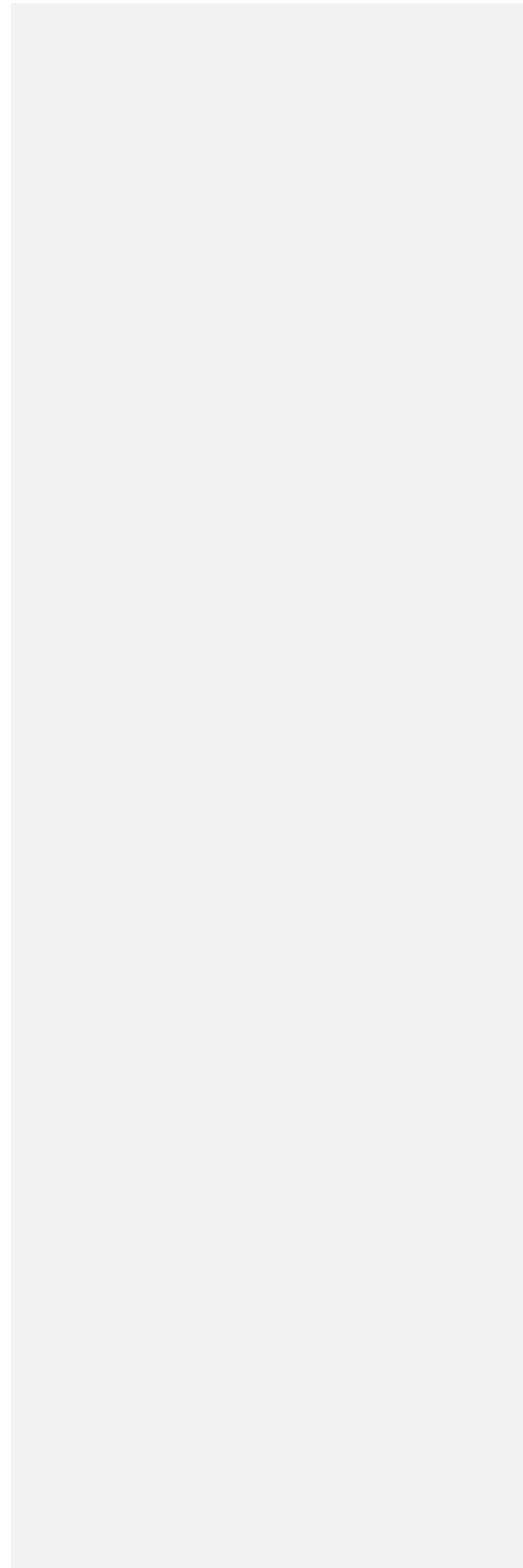
Using personal data allows us to develop a better understanding of everyone who engages with us and in turn to provide you with relevant and timely information about the work that we do — both on and off stage.

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.

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WHO WE ARE

Theatre de Complicité 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.

If you have any queries regarding this policy please get in touch, our contact details are: Complicité, Room 15, Jolt Studios, 27 St. Aldate Street, Gloucester, England, GL1 1RP

Email: admin@complicite.org

Phone: +44 (0)20 7485 7700

Website: <https://www.complicite.org>

Data Protection Officer: Sarah Kingswell, Finance & Operations Manager

You also have the right to lodge a complaint with the supervisory authority, [Information Commissioner's Office \(ICO\)](#)

[Data protection principles - guidance and resources](#)

DATA SUBJECT RIGHTS

Under the UK General Data Protection Regulation (UK GDPR), individuals have specific rights regarding their personal data. These rights include:

1. **Right to Be Informed:**
 - You have the right to be informed about the collection and use of your personal data.
2. **Right of Access:**
 - You have the right to request access to the personal data we hold about you. This is commonly known as a Subject Access Request (SAR).
3. **Right to Rectification:**
 - If any of your personal data is inaccurate or incomplete, you have the right to request that we correct or complete it.
4. **Right to Erasure (Right to Be Forgotten):**
 - You can request the deletion of your personal data in certain circumstances, such as when the data is no longer necessary for the purpose it was collected, or if you withdraw your consent.
5. **Right to Restrict Processing:**
 - You have the right to request that we limit the processing of your personal data if:

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- You contest the accuracy of the data.
 - The processing is unlawful, and you oppose erasure.
 - We no longer need the data, but you require it for legal claims.
 - You object to processing, pending verification of our legitimate grounds.
6. **Right to Data Portability:**
- You have the right to receive your personal data in a structured, commonly used, and machine-readable format. You may also request that we transfer your data to another data controller where technically feasible.
7. **Right to Object:**
- You have the right to object to the processing of your personal data if it is based on legitimate interests or used for direct marketing purposes.
8. **Rights Regarding Automated Decision-Making and Profiling:**
- If we make automated decisions that produce legal or similarly significant effects on you, you have the right to:
 - Obtain human intervention.
 - Express your point of view.
 - Challenge the decision.
9. **Right to Withdraw Consent:**
- If we process your personal data based on your consent, you have the right to withdraw that consent at any time.
10. **Right to Lodge a Complaint:**
- If you are unhappy with how we handle your data, you have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (ICO).

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

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- 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, traffic data, operating system, the resources that you access, and cookies related to site performance and advertising. Information on how we use cookies on our website can be found in our Cookies Policy
- Image and likeness; as captured in photographs and videos we use for promotional purposes (note: we may seek specific consent for prominent or impactful uses, but typically not for group shots, background inclusion or internal use)
- Other background personal information you provide to us (for example when you apply for a job, tell us your story, provide a reason for donating or correspond with us)

We do not knowingly collect personal data from children under the age of 16 without parental consent. If we discover that we have inadvertently collected such data, it will be promptly deleted.

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, Instagram, Meta, 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 DATA PROCESSING

Under the UK GDPR, sensitive personal data (referred to as "special category data") includes information about health, ethnicity, religious beliefs, political opinions, trade union membership and sexual orientation. Processing this type of data requires additional safeguards.

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How We Handle Sensitive Data

We may collect and process sensitive personal data only in specific, clearly defined circumstances. Examples include:

- Adapting our work environment for employees with health or accessibility needs
- Understanding dietary requirements for event planning
- Conducting due diligence on significant donations to ensure compliance with anti-money laundering and ethical fundraising policies

Demographic Data Handling

To comply with funder reporting requirements and to monitor diversity, we may request demographic data such as ethnicity or gender. However:

- All demographic data collected is anonymous and cannot be linked to any individual
- Anonymisation ensures the data is used only for aggregated statistical purposes, such as assessing participation diversity or meeting funder obligations, without compromising personal privacy

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)

To send information about Learning & Creative Engagement (which you would need to opt-in for)

Legal basis

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

- **Contract Basis**

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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.

- **Employment, Social Security, and Social Protection Laws**

Sensitive personal data may be processed to meet obligations under employment law, such as accommodating disabilities

- **Vital Interests**

In exceptional situations, such as a medical emergency, sensitive data may be processed to protect someone's vital interests

- **Archiving, Research, and Statistical Purposes**

Anonymised sensitive data may be used for statistical analysis to support funder reporting or improve equality and diversity efforts.

THIRD PARTIES

We may need to disclose your details:

- If we run an event in partnership with another named organisation so that they can help us run the event
- In order to comply with any legal obligation to do so. This includes the police and other crime protection and detection agencies or regulatory bodies
- To our legal advisors
- For the purposes of regulatory or inspection compliance, for example, to the Charity Commission

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- To funding bodies, particularly Arts Council of England, who may use anonymised personal information to analyse our audience development programmes, ticket sales and self-generated funding to understand the impact of the public investment made in Complicité
- Data processing services acting in accordance with our instructions, and subject to confidentiality obligations

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.

We may also receive data about you from third parties. This could include other artistic venues where you have seen Complicité's work, or other partners that we work with where you have consented to share your information with Complicité.

We may also receive information from external sources, which enables us to gain a better understanding of our audiences, visitors and supporters and to improve our fundraising and marketing methods.

We do not sell personal details to third parties for any purpose, nor will we share your personal data with any other organisations or promoters that have not been named in our privacy policy for their own marketing communications.

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 unauthorised access and improper use. ▼

Deleted: 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 organi

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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 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.

Complicité has a Data Retention Schedule that shows clear retention periods and the criteria for determining retention periods for specific types of data.

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. Cookies are also used to remember settings, so you don't have to change them again every time you load a web page. They recognise that you are logged in to an area of the website, so you don't have to keep re-entering your username and password.

SOCIAL MEDIA

We use social media to broadcast messages and updates about events and news. On occasion, we may reply to comments or questions you make to us on social media platforms. You may also see adverts from us on social media that are tailored to your interests.

Depending on your settings and the privacy policies used by social media and messaging services like Facebook, LinkedIn or Instagram, we may receive non-personally identifying demographic or analytical information from these services that enables us to better understand the reach and effectiveness of our advertising.

HOW YOU CAN ACCESS YOUR DATA

You may request details of the personal data we hold about you under the General Data Protection Regulation.

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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 policy 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:

- donate 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.

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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.

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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.

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.

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Your Right to Opt-Out for fundraising and research purposes

We respect your right to privacy and choice in how your personal information is used for fundraising and research purposes. If you do not wish to be part of prospect research or receive fundraising communications, you may opt-out at any time.

Opting Out of Fundraising Communications:

- Click the "unsubscribe" link found at the bottom of any fundraising email.
- Call us at +44 (0)20 7485 7700 or send an email to admin@complicite.org with the subject "Fundraising Opt-Out."
- You can also write to us at: *Complicité, Room 15, Jolt Studios, 27 St. Aldate Street, Gloucester, GL1 1RP*

We will ensure your preferences are updated promptly, and you will not receive further fundraising communications unless you choose to opt back in.

Opting Out of Prospect Research and Profiling:

- If you wish to opt-out of any profiling or prospect research activities:
 - Contact our Data Protection Officer at admin@complicite.org or call +44 (0)20 7485 7700.
 - We will remove your data from future research and ensure no profiling activities are carried out without your explicit consent.
 - This will not affect essential communications regarding services or activities you are directly involved in (e.g., membership benefits or event participation).

Respecting Anonymity:

We fully respect the wishes of donors who prefer to remain anonymous. If you wish to donate anonymously or refrain from any public acknowledgment, please indicate this preference when making your contribution.

Complicité will ensure that any opt-out requests are respected and processed without delay, reinforcing our commitment to ethical fundraising practices.

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DATA BREACH IDENTIFICATION, REPORTING AND MANAGEMENT

We are committed to protecting personal data and ensuring that any data breaches are swiftly identified, reported, and appropriately managed. This process ensures compliance with the UK GDPR and protects the privacy and rights of individuals whose data we process.

1. Identifying a Data Breach

A data breach occurs when there is an incident that results in the accidental or unlawful destruction, loss, alteration, disclosure, or access to personal data. This includes, but is not limited to:

- Unauthorised access to personal data
- Loss or theft of physical or electronic records containing personal data
- Accidental email or data sharing to the wrong recipient
- System breaches or hacking incidents
- Mismanagement or failure to protect data adequately

Anyone within Complicité who suspects or discovers a data breach must immediately inform the Data Protection Officer (DPO), Sarah Kingswell, admin@complicite.org

2. Reporting a Data Breach

If you become aware of a potential data breach, you must report it **immediately** to the DPO using the following steps:

- Notify the DPO: Provide as much information as possible, including the nature of the breach, how it occurred, the data involved, and the affected individuals (if known).
- Initial Response: The DPO will assess the severity and impact of the breach and determine the next steps.

3. Assessing the Breach

Once the breach is reported, the DPO will:

- Investigate the circumstances of the breach and assess the potential impact on individuals' privacy and data security.

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- Identify any mitigating actions already taken to prevent further damage (e.g., locking down access, recovering lost data, etc.).
- Determine if the breach is likely to result in a risk to the rights and freedoms of individuals (e.g., exposing sensitive personal data, identity theft, etc.).

4. Notifying the Information Commissioner's Office (ICO)

If the breach is determined to be serious and poses a risk to the rights and freedoms of individuals, the charity must notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, as required by the UK GDPR.

- The DPO will submit a report detailing the nature of the breach, the categories and approximate number of individuals affected, the likely consequences, and the measures taken to address the breach.
- If the breach does not pose a significant risk to individuals' rights and freedoms, the DPO may determine that ICO notification is not necessary.

5. Notifying Affected Individuals

If the data breach is likely to result in a high risk to the rights and freedoms of affected individuals (e.g., sensitive data has been exposed), Complicité will notify those individuals without undue delay. The notification will include:

- A description of the nature of the breach
- The potential consequences of the breach
- Measures taken or proposed to mitigate the potential impact
- Guidance on steps individuals can take to protect themselves, if applicable

6. Managing the Breach

Once a breach is identified and reported, the DPO will lead the efforts to manage the incident and prevent future breaches. This may involve:

- Taking immediate action to contain the breach (e.g., securing data, revoking access).
- Investigating the root cause of the breach to understand how it happened and prevent recurrence.
- Reviewing the security measures in place and implementing additional safeguards or procedures if necessary.

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- Keeping a record of the breach, including its nature, the response taken, and the outcomes, for future reference and compliance purposes.

7. Post-Breach Review and Actions

After the breach has been managed, the charity will conduct a post-incident review to assess:

- The effectiveness of the response and any areas for improvement.
- Whether additional training or awareness is required for staff to prevent future breaches.
- Whether changes to data handling practices, security policies, or IT systems are needed to strengthen data protection measures.

If you have any concerns about data security or suspect a breach, please contact the DPO, Sarah Kingswell, immediately at admin@complicite.org

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