

STUDIO WAYNE MCGREGOR
PRIVACY POLICY

PURPOSE OF PRIVACY POLICY

Studio Wayne McGregor is committed to protecting your personal information and to being transparent about the information we hold about you. Using personal information allows us to develop a better understanding of our audiences, and to provide relevant and timely information about the work that we do. Personal information also helps us as a charity to engage with current and potential donors.

The purpose of this policy is to give you a clear explanation about how we collect and process your personal information through your use of our website, including any data you may provide through this website and when you sign up to our newsletters or mailing lists or make a donation. It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information. This privacy policy supplements our other policies and is not intended to override them. We will use the information that we collect about you in accordance with:

- The Data Protection Act 1998
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The EU General Data Protection Regulation (Regulation EU 2016/679), ('GDPR') which becomes effective from 25 May 2018

This policy explains:

1. Who we are
2. Information we may collect about you
3. How we collect your data
4. How we may use your information
5. Disclosure of your details to third parties
6. Security of your personal information
7. Data retention
8. Your legal rights
9. Notification of changes to our privacy policy
10. Contact details and further information

1. WHO WE ARE

Studio Wayne McGregor Ltd is the creative engine for choreographer and director Wayne McGregor CBE, and the home of his life-long enquiry into thinking through and with the body. Studio Wayne McGregor is a charity registered in England and Wales, number 1090055 and a company limited by guarantee registered in England and Wales, number 02985577.

2. INFORMATION WE MAY COLLECT ABOUT YOU

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, i.e. anonymous data. We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport details.

- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details
- **Transaction Data** includes details about payments to you and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. This also includes us making a note of conversations we have had with you in person and/or communications you have sent to us. This helps us to manage our relationship with you and ensures you only receive communications from us that are relevant and timely.
- **Profile Data** includes background information to enable us to maintain a relevant and tailored relationship with you.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, 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.

For equal opportunities monitoring when recruiting and the Arts Council National Portfolio Organisation Annual Submission of workforce statistics, we may collect some **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, sexual orientation and gender identity).

3. HOW WE COLLECT YOUR DATA

We collect different information about you in a number of ways:

Information you give us

When you sign up to our newsletter/emailing lists, request marketing materials, give us feedback, apply for a job, make a donation, or otherwise give us personal information online, in paper or electronic form, over the phone or face to face, we will store the personal information you give to us such as your name, email address, postal address and telephone number. We will also keep a record of your donations.

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Information from third parties

We occasionally receive information about you from third parties as set out below:

- (a) Analytics providers such as Google
- (b) Advertising networks such as Facebook
- (c) Search information providers such as Google AdWords

4. HOW WE MAY USE YOUR INFORMATION

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need 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.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your explicit consent before using your personal information in that specific situation. You have the right to withdraw consent to marketing at any time by contacting us. You will find the relevant contact details at the end of this policy.

Purposes for which we will use your personal information

We have set out below a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing |
|---|---|--|
| To register you on our emailing/newsletter list | Identity Contact | <ul style="list-style-type: none"> • Consent |
| To register you as working with us | Identity Contact Financial Transaction | <ul style="list-style-type: none"> • Performance of a contract with you |
| To manage and process fees and payments | Identity Contact Financial Transaction Marketing & Communications | <ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (e.g. to recover payments due to us) |
| To manage our relationship with you | Identity Contact Profile Marketing & Communications | <ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation (e.g. notifying you about changes to our privacy policy) • Necessary for our legitimate interests (e.g. to keep our records up to date and maintain effective bespoke communications and relationships) |
| To administer and protect our organisation and website (including troubleshooting, data | Identity Contact | <ul style="list-style-type: none"> • Necessary for our legitimate interests (e.g. for running our organisation, |

| | | |
|---|--------------------|---|
| analysis, testing, system maintenance, support, reporting and hosting of data) | Technical | provision of administration and IT services, network security and to prevent fraud) <ul style="list-style-type: none"> • Necessary to comply with a legal obligation |
| To use data analytics to improve our website, marketing and communications with you, client relationships and experiences | Technical Usage | <ul style="list-style-type: none"> • Necessary for our legitimate interests (e.g. to define types of clients interested in our organisation, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

Marketing communications

We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful, and never excessive.

We use consent as the legal basis for communications by email and only send communications to those people who have opted in to receive them. We will provide you with an option to unsubscribe in every email that we send to you subsequently.

As part of our service to you, we may contact you by email or telephone to provide essential information related to events you may attend.

Fundraising communications

Under our legitimate organisational interest, we may contact you by email, post, or occasionally by telephone, to seek your support for our fundraising priorities. You are able to opt out at any time by using the contact details at the end of this policy or by contacting us.

Other processing activities

We may use profiling techniques 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. You have the right to object to any of this processing at any time. If you wish to do this, please contact us.

5. DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES

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

- To our service providers who process data on our behalf and on our instructions (for example Mailchimp, Sheep – customer relationship databases). We require all third parties to respect the privacy of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.
- 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).

We may share anonymised personal information with other organisations, particularly Arts Council England and the Audience Agency, who use this to analyse our audience development and reach and

self-generated funding to understand the impact of the public investment made in Studio Wayne McGregor.

6. SECURITY OF YOUR PERSONAL INFORMATION

We have 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 and that they will only process your personal information on our instructions. The third parties will also be subject to a duty of confidentiality.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal data, the potential risk 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 requirements.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as follows:-

a) Request access to your personal information

You have a right to request a copy of the personal information that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below.

b) Request correction of your personal information

You have the right to request that we correct the personal information we hold about you, although we may need to verify the accuracy of the new information you provide to us.

c) Request erasure of your personal information

You have the right to request that we delete or remove personal information where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons- which will be notified to you at the time of your request.

d) Object to processing of your personal information

You have the right to object to the 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.

e) Request restriction of processing your personal information

You have the right to request that we suspend the processing of your personal data in the following scenarios:

- a) if you want us to establish the data's accuracy
- b) where our use of the data is unlawful but you do not want us to erase it

- c) 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
- d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

f) Request transfer of your personal information

You have the right to request that the personal information we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please 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.

g) Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. In line with the GDPR regulations, we may 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 information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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 may 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.

9. NOTIFICATION OF CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time. We will communicate any changes to our patrons and supporters where we have accurate contact details and where they would expect to receive communications from Studio Wayne McGregor. Please visit this section of our website periodically in order to keep up to date with changes in our privacy policy.

10. CONTACT DETAILS AND FURTHER INFORMATION

Please get in touch with us if you have any questions.

Email us: dataprotection@waynemcgregor.com

Call us: 020 7278 6015

Write to us: Studio Wayne McGregor, Broadcast Centre, Here East, 10 East Bay Lane, Queen Elizabeth Olympic Park, London E15 2GW

Privacy policy effective from 1 May 2018