



# HOLMFIRTH TECH LTD

## **PRIVACY POLICY**

**Version Date 30 July 2020**

### **Policy statement**

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 patrons and in turn provides 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 are given 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 the Data Protection Officer at Holmfirth Tech Ltd

### **Who we are**

Holmfirth Tech Ltd is a charitable community benefit society registered with the FCA. Our registration number of 7739.

### **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, register for an event or activity, make a donation or book a room, we will store personal information you give us such as your name, email address, postal address and telephone number. We will also store a record of your purchases and donations, including room and desk bookings.

#### **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. 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 patrons unless there is a clear reason for doing so.

## **Legal basis**

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

### **CONTRACT PURPOSES**

When you make a purchase from us (including room and desk bookings), 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.

### **LEGAL OBLIGATION**

If you purchase shares in Holmfirth Tech Limited or make a donation against which we claim Gift Aid, then we have a legal obligation to process and store your data.

### **LEGITIMATE BUSINESS INTERESTS**

In certain situations we collect and process your personal information 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 do not 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.



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We may also contact you about our work by telephone however; we will always get explicit consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to your purchases (as above).

## **Other processing activities**

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

We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.

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 it and the content and ads 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.

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by our own interests or your 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 the subsidiaries described above when it is necessary for them to be able to provide you with products or services that you have requested.

To our own service providers who process data on our behalf and on our instructions (for example our membership management software 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.

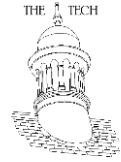
Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

To activity leaders and event hosts whose activities or events you participate in.

## **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, to keep track of your basket) as well as to provide 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 can make.



## **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).

## **Maintaining your personal information**

We store your personal information indefinitely so that for any subsequent purchases you make we are able to 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, and in particular, if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

The Directors, Holmfirth Tech Limited, Huddersfield Road, Holmfirth, HD9 3AR