Privacy Policy

Box Clever Theatre is committed to protecting your personal information and being transparent about what information we hold. We will use your personal information in accordance with all applicable laws concerning the protection of personal information. Box Clever is registered with the Information Commissioner’s Office.

Section 1: Overview

Data Collection

We receive personal information when a member of the public acting as an individual or as a representative of an organisation undertake any of the following:

- Signs up to receive a newsletter from Box Clever.
- Completes a post-show survey or evaluation.
- Buys a product or a service (i.e. Play or workshop) from Box Clever.
- Signs up to be a Friend or Trustee of Box Clever.
- Makes a donation to Box Clever.

We maintain a record of their personal data together with a record of our communication history. We keep a record of the emails we send, and we may track whether they receive or open them so we can make sure we are sending them the most relevant information. We don’t use “cookies”. We may also obtain information about organisations from other sources including the information available publicly. This may include information found in places such as Companies House, a work website or information that has been published in articles/ newspapers.

Box Clever as a charity and how we respect our supporters

Box Clever relies heavily on charitable support to maintain our programme of plays and workshops for young people. Supporters are able to opt in to receive information about ways that they can make a real difference to our programmes, and invitations to events where individuals can get closer to our artistic programme by joining our Friends’ schemes. We will not contact any individual if they have not opted in to receive this type of communication from us.
**Keeping personal information safe and secure**

Personal data from individuals, will be held and processed on Box Clever’s internal database systems. For employees, personal data relating to payroll will be held securely on our secure payment and accounting system, where access is limited to and controlled by the company’s Finance Manager. We hold contact details and a record of interactions with other organisations/schools as described above. Where possible we aim to keep a single record (soft copy) for each individual.

The full-time staff of Box Clever will take responsibility for the maintenance of clean data entry and monitor that this privacy policy is not at risk of breach. A full-time member of the Box Clever management team is appointed ‘processor’ who is responsible for processing data on behalf of the controller. A second full-time member of the management team is appointed as ‘controller’ who will determine the purpose and means of processing data. The controller in turn will report a member on the Board of Trustees with special responsibility for protection of privacy.

Personal data is always held securely. Access to customer information is strictly controlled. Box Clever’s system can only be accessed by people who need it to do their job. We may need to disclose an individual’s details if required to the police, regulatory bodies or legal advisors. We will only ever share data in other circumstances if we have explicit and informed consent from the individual.

**Use of personal information**

When we collect an individual’s data, we will be clear on how we will use their data once we receive their explicit consent, and will not to do anything beyond this. If an individual makes a purchase, becomes a Clever Friend, signs up to the newsletter, signs up for an event or gives a donation we usually collect name and contact details. When surveying audience members we may also ask for the individual’s age, gender and ethnicity and their response is always anonymised and never stored to someone’s personal information. If making a donation, we may also ask why the individual has decided to donate to us, again for research purposes where responses are never held against an individual’s personal information.

We use an individual’s contact details to provide the individual with information on our upcoming events, products, services or information asked for; we also ensure we know how the individual prefers to be contacted. The responses from our research and surveys help us to understand how we can improve our communications and gain insight to who is engaging with us.
We will not contact an individual for marketing and fundraising purposes unless an individual has opted into to and ticked at least one of our contact preferences boxes on the correspondence the individual receives from the company. We will make it clear on all communications how the individual can change their preferences. The company will write to all individuals listed as Friends or recipients of the newsletter, if they want to opt in to continue to be a Friend or a recipient of a newsletter, giving both a company contact if they wish to change their consent.

**Giving control**

With an individual’s consent, we will tell the individual about events, how to book and information about our programme of work. We do not sell personal details to third parties for any purpose. We will only share personal details for the purposes of marketing if an individual has given explicit consent for us to do this. We will give individuals the opportunity to accept or decline consent to any marketing or fundraising email communications and postal fundraising communications received from us, at the first point of contact with us.

We will give the individual the right to access their personal information upon request. If requested, we will send free of charge a confirmation of receipt and a copy of any personal data held by giving clear indication as to whether or not personal data concerning them is being processed, where and for what purpose. We will give the individual the right. To erase personal data of a subject and cease any dissemination, if requested to do so by the data subject. We will give assurance that the company will hold only the data absolutely necessary for the completion of its duties, as well as limiting the access to personal data to those needing to act out the processing. Any individual on our database who has not opted in to receive communication AND has not purchased our products/services over 5 years will be erased.

**Third parties**

We may share anonymised personal information with other organisations, particularly Arts Council England, who use this to analyse our audience reach and self-generated funding. Companies such as Mydonate and Just Giving to whom the public can donate funds to Box Clever, will have their own respective privacy policies.

**Section 2: Audit Trail**

Box Clever intends to meet all its legal obligations to protect people from the misuse of their personal information. It is our aim that trustees and all staff are fully informed of these obligations. Any employee deliberately acting outside their recognised authority will be subject to the Box Clever disciplinary procedures. Individuals whose information is held
and processed by Box Clever can be assured that we will treat their personal data with all due care. It is possible that other legislation may, at times, override data protection law, and it should be noted that Box Clever intends to fulfil all of its legal responsibilities, whatever these may be.

1. **With reference to data on subscribers to the Company Newsletter**: To store data for as long as the subscriber wishes in order to supply them with information about the Company’s activities. To source communication details through request to the subscriber. The data to comprise name and contact details.

2. **With reference to the collection of and collation of post-performance audience surveys/evaluations**: All data is anonymised and once collated, the original survey/evaluation forms are destroyed.

3. **With reference to data collected and retained of potential and actual clients (schools, Local Authorities and theatres) and funders** in order to promote our catalogue of plays to them via email and telephone. To source their contact details via their websites and via telephoning the organisations to request the contact information. The data comprises of the name of the Heads of key departments at schools or Local Authorities and their email addresses.

4. **With reference to data on actual employees**: To store data in order to supply information when required to do so. To source this data through application forms completed by employees. The data to comprise name, DOB, address, previous employment details, qualifications, NI numbers, bank and DBS details. To retain this data as it is a legal requirement of our public liability insurance and is held separately and securely by our Finance Manager.

5. **With reference to data on Friends & Trustees of the Company**: To store data for the duration of their Friendship in order to supply them with information about the Company’s activities. To source this data through request to the Friends. The data to comprise name and contact details. Personal data is deleted within a maximum period of twelve months after expiration. Friends who have opted in, will be notified of this. Need to add in that it will only be to those who have opted in

6. **With reference to data on funders of the company**: To store data from Arts Council, Trusts and Corporations for the duration of their support and longer if in the legitimate interest of the company in order to supply them with information about the Company’s activities. The data to comprise name and contact details of the organisations concerned.