



PINK COW
THEATRE

PRIVACY STATEMENT



REVIEWED:
MAY 2023

DATE OF NEXT REVIEW:
MAY 2024



INTRODUCTION

The *General Data Protection Act 2016* (GDPR) sets out to protect the rights and freedoms of natural persons, to ensure that personal data is not processed without their knowledge and, wherever possible, processed with their consent.

Pink Cow holds all data in accordance with GDPR and within this document, explains how data is collected, processed and shared.

AIMS & INTENT

- Define the types of data Pink Cow processes.
- Explain how data collected is used and shared.
- Explain the rights of the data subject.

PRINCIPLES

Information held by Pink Cow follows the characteristics described within the GDPR and will make every effort possible to comply with these principles:

LAWFUL, FAIR & TRANSPARENT

Data collection must be fair, for a legal purpose and we must be open and transparent as to how data will be used.

LIMITED FOR ITS PURPOSE

Data can only be collected for a specific purpose.

DATA MINIMISATION

Any data collected must be necessary and not excessive for its purpose.

ACCURATE

The data we hold must be accurate and kept up to date.

RETENTION

We cannot store data longer than necessary.

INTEGRITY & CONFIDENTIALITY

The data we hold must be kept safe and secure.

If a data breach occurs and the breach results in material loss of data, Pink Cow will report the breach within 72 hours to the Information Commissioners' Office (ICO) by calling: 0303 123 1113.

WHAT WE COLLECT (PARTICIPANTS)

DATA PROCESSED AS A REQUIREMENT OF MANAGING YOUR MEMBERSHIP

TYPE OF INFORMATION	PURPOSE	COLLECTED FROM	SHARED WITH
Contact Details (incl. address, phone numbers and email address)	To ensure adequate contact and communication can be made	Participation Form	N/A
Monitoring Data (incl. DOB)	To allow appropriate provisions to be made		
Medical information	To ensure appropriate care is given in an emergency or prevent one from happening		

DATA PROCESSED WITH YOUR CONSENT

TYPE OF INFORMATION	PURPOSE	COLLECTED FROM	SHARED WITH
Photos and videos of participants	Publicity including publishing to the Pink Cow website, social media, flyers, programmes and in press releases.	Pink Cow staff	The public (online) and press companies

WHAT WE COLLECT (STAFF / CREW)

DATA PROCESSED AS A REQUIREMENT OF EMPLOYMENT / VOLUNTEERING

TYPE OF INFORMATION	PURPOSE	COLLECTED FROM	SHARED WITH
Contact Details (incl. address, phone numbers and email address)	To ensure adequate contact and communication can be made	Application Form / Upon Request	N/A
Monitoring Data (incl. DOB)	To allow appropriate provisions to be made		
Medical information	To ensure appropriate care is given in an emergency or prevent one from happening		
Identity Documents (incl. Passport, right to work in the UK, Driver's License, DBS check)	To verify and confirm identities and ensure the welfare and safety of participants		Disclosure and Barring Service
Payroll Information (incl. NI Numbers, P45s, banking details)	To allow for payment of services		N/A

HOW DATA IS STORED

METHODS

Data collected through Participation Forms will be written electronically to a password protected spreadsheet in possession of Pink Cow management. Hard copies of the Participation Forms will be held securely.

Photos / videos taken during productions or rehearsals will be in sole possession of a DBS checked member of staff and will be shared only through official means stated in the table on page 2. Data from camera SD cards will be transferred to our secure storage system as soon as it is possible to do so.

MODIFICATION

Each participant / staff member is responsible for informing Pink Cow if any of their data changes (e.g. address, email, phone number, etc) so that data held is accurate and complete.

DELETION

Data will be retained until it is no longer legally required by Pink Cow, and it is no longer relevant for our activities (e.g. Participant is no longer affiliated with Pink Cow).

DATA SUBJECT RIGHTS

The GDPR gives individuals eight data subject rights relating to their personal data. These are:

RIGHT TO BE INFORMED

Pink Cow is required to say what data we collect, how we use it, how long we keep it for and whether it will be shared with third parties (As outlined in earlier pages within this document).

RIGHT OF ACCESS

Data subjects have the right to know what data Pink Cow holds about them. Upon submitting an access request for this data, Pink Cow has one month to produce this information.

RIGHT TO RECTIFICATION

Data subjects have a right to request that any inaccurate or incomplete data Pink Cow holds on them is updated. Upon submitting a rectification request, Pink Cow has one month to modify the data.

RIGHT TO BE FORGOTTEN

Data subjects have a right to request that Pink Cow erases their data in certain circumstances, such as when the data is no longer necessary, the data was unlawfully processed, it no longer meets the lawful ground for which it was collected or where the data subject withdraws consent to the collection of their data.

RIGHT TO RESTRICT PROCESSING

Data subjects have the right to request that Pink Cow limits the way it uses personal data. This typically means that the data is still held by Pink Cow, but it cannot be used. Processing actions such as deletion or rectification will require the data subject's permission.

RIGHT TO DATA PORTABILITY

Data subjects are permitted to obtain and reuse their personal data for their own purposes across different services. This right only applies to personal data that the data subject has provided to Pink Cow by way of contract or consent.

RIGHT TO OBJECT

Data subjects can object to the processing of personal data that is collected on the grounds of legitimate interests or the performance of a task in the interest of official authority. Pink Cow must stop processing information unless it can demonstrate legitimate grounds for processing that overrides the interests, rights and freedoms of the individual. Pink Cow can also refuse this right if the processing is for the exercise of defence of legal claims.

RIGHTS RELATED TO AUTOMATED DECISION MAKING

The GDPR includes provisions for decisions made with no human involvement, such as profiling, which uses personal data to make calculated assumptions about individuals. Data subjects have the right to request a review of processing if they believe the rules regarding automated decision making aren't being followed.

LAST REVIEW DATE:
MAY 2023

DATE OF NEXT REVIEW:
MAY 2024