



The Spring

Great experiences for everyone

Privacy Statement

WHO WE ARE

The Spring Arts & Heritage Centre is committed to protecting your privacy, including online, and in the transparent use of any information you give us. This notice sets out what information we may hold about you if you provide it, and how that data will be used.

The Spring Arts & Heritage Centre is registered with the Information Commissioner's Office as a Data Controller no. Z5327402

We can be contacted at the following address:

56 East Street
Havant
PO9 1BS

By phone on 02392 472 700, or email info@thespring.co.uk

The Data Protection Officer is Sophie Fullerlove, Director.

PURPOSE OF THIS POLICY

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 to provide 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 [and all of our subsidiaries] collect and use the information we collect 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:

- **Who we are**
- **The purpose of this policy**
- **What information we collect**
- **How we keep your data secure**
- **How we will use your data**
- **Photography and filming**
- **Website, cookies and browsing**
- **Third Parties and data processing services**
- **Maintaining your personal information**
- **Subject access requests and the right to be forgotten**

- **Contact details and further information**

No information will be shared more widely than is set out below unless it is required by law.

WHAT INFORMATION WE COLLECT

Information you give us

You give us your personal information when you buy a ticket in person, on the phone or online. You also give us your information when you sign up to our mailing or e-mail list, make a donation or communicate with us. We will store personal information you provide including name, address, telephone number and email address. We will also store a record of your purchases and donations.

Information about your interactions with us

We will keep a record of emails we send you and we may track whether you receive or open them, which links you have clicked on and whether you have made a subsequent purchase online. When you visit our website, we may analyse how you interact with our content.

Sensitive information

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.

NHS Track and Trace

During the Covid Pandemic, The Spring is collecting data in line with the government requirements for the Track and Trace scheme.

There are three methods by which visitors can register their visit:

- 1) **Track and Trace QR Codes**
The Spring displays QR codes allowing visitors to register their visit to the building. Data retained via this method is managed by the track and trace service in line with their protocols and processes. The Spring has no access to this information.
- 2) **Text message**
Visitors can choose to register their name with The Spring via text message. Messages are sent to a mobile phone which is kept solely for this purpose. It can only be accessed by managers of The Spring and is only used for this purpose. Messages are deleted after 21 days. The Spring publishes these data term son all instruction materials.
- 3) **In person**
Visitors can leave their names and date of visit with a member of café staff. Sheets containing the information are locked away each day. They are destroyed after 21 days. The information is used solely for Track and trace purposes.

The Spring may also use data gathered via ticket sales to pass to the NHS track and trace service if required. We will continue to collect data in this manner until it is no longer required by the government.

HOW WE KEEP YOUR DATA SECURE

Your personal data will be held on The Spring's system or on systems managed by suppliers on behalf of The Spring.

All details provided when purchasing tickets including personal details and purchase history are held by **Ticketsolve** (ticketsolve.com) who act as a data processor for The Spring Arts & Heritage Centre. Access to Ticketsolve.com is strictly controlled and only accessed by people who need it to do their job.

View the Ticketsolve privacy notice [here](#)

HOW WE WILL USE YOUR DATA

Communication about events you are attending

We will contact you by email or telephone with any essential information regarding any event you have purchased tickets for e.g. cancellations, timings, reschedules etc. and to collect feedback following the event under the fulfilment of contract basis.

If you do not provide us with your personal information when purchasing your ticket, we will not be able to contact you regarding any changes to your event.

If we run an event in partnership with another named organisation your details may need to be shared in order that they can help us run the event.

Marketing communications

We want to communicate with you about the work that we do in a way that is relevant and reasonable. To do this, we use data we have stored about you such as contact details, previous purchases and preferences. We will provide you with information on forthcoming events, offers and our fundraising efforts where appropriate.

The first time you give us your details, we will ask you if you consent to receiving different types of marketing communication from us. If you give your consent but then change your mind at any time, you can let us know you would like to opt-out.

- In the case of postal communication about our events and services, you can choose to not receive these at any time by using the contact details at the end of this policy.
- In the case of email communication about our events and services, 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.
- In the case of fundraising communications by post and email, you can choose to not receive these at any time by using the contact details at the end of this policy or by unsubscribing in any fundraising email that we send you or by using the contact details at the end of this policy.

If we already hold your details

If we have held your contact details from before 25 May 2018 and you are currently opted in to receive marketing communications from us, we will continue to contact you using our legitimate organisational interest until we are able to update your consent preferences or hear from you otherwise.

- In the case of postal communication about our events, services and fundraising activities, we will continue to contact you under legitimate interest as you will have opted-in to receive postal mail from us when you first gave us your details or at any point up until 25 May 2018. You can choose to not receive these at any time by using the contact details at the end of this policy.

- In the case of email communication about our events and services, we will continue to contact you under legitimate interest (soft-opt in) as you will have opted-in to receive emails from us when you first gave us your details or at any point up until 25 May 2018. 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.

We will not be able to let you know about our fundraising activities via email until we are able to gain your consent under the GDPR.

Other processing activities

In order to offer you the best service possible, we may share data from Ticketsolve with Audience Finder (The Audience Agency). This will then be analysed and compared with publically available information e.g. census records. All data in Audience Finder is processed in an anonymised way.

Debit and Credit Card information

If you use your credit or debit card to purchase from us or to make a donation at the Box Office or over the telephone, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). We do not store card details after the transaction is complete.

PHOTOGRAPHY AND FILMING

From time to time The Spring may take photographs or record film of events or activities. These are used for marketing purposes, to document our work and to report to our funders. All images are stored securely. Whenever photography or filming is taking place we ensure clear signage is placed in appropriate areas. At any time, you can ask the photographer or a member of staff not to be included in the photographs.

The Spring operates a CCTV system for the safety and security of people, both visitors and staff, museum exhibits, property and buildings. It may be used to investigate security incidents in order to obtain evidence, should such incidents occur. You may, at any time, request access to footage that features you. Requests must be made in writing to the Director and are subject to the conditions laid out in The Spring's CCTV policy.

WEBSITE, COOKIES AND BROWSING

Our website uses cookies. These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

You can prevent the action of cookies by adjusting the settings on your browser. Be aware that disabling cookies will affect the functionality of the website and may result in the disabling of certain features and functionality.

We use third party services to collect standard internet log information and details of visitor behaviour patterns. You can read more information on these below.

| Cookie | Data | Purpose |
|------------------------------|---|---|
| Universal Analytics (Google) | _ga _gat _gat_UA_46377663-1 _gid | These cookies collect information about how our visitors use our website. We use the information to help us report and improve on our website. These cookies collect information in an anonymous form, including the number of visitors to the website, device used, where visitors have come to the website from, and the pages they visited. |
| Facebook (Facebook Pixel) | fr | This cookie is placed by Facebook. It enables The Spring to measure, optimise and build audiences for advertising campaigns served on Facebook. We use the Facebook Pixel to ensure that our adverts are seen by users most likely to be interested in our events and services. We also use the Facebook Pixel to track the effectiveness of our advertising campaigns and users' behaviour between Facebook, The Spring's website and Ticketsolve. |

Our website thespring.co.uk uses secure server software (SSL) with 128-bit encryption: the industry standard for secure commercial transactions. It encrypts all of your personal information, including name, address and credit card number, so that it cannot be read as the information travels over the internet. While on a secure page, such as a donation form, the lock icon on web browsers becomes locked, as opposed to un-locked, or open, when you are just surfing. Additionally, our choice of payment provider means we never hold your credit card details on our website.

THIRD PARTIES AND DATA PROCESSING SERVICES

Visiting artists and companies

When booking tickets for some events you may be asked if you consent to having your contact details shared with the visiting artist or company providing the performance you are booking. This allows them to analyse their audiences and contact you directly about their work. If you choose to opt-in we will pass your details on to those companies. They in turn will provide you with their own privacy policy within 30 days and provide a means for you to opt-out of receiving further information from them.

We will share your data with certain data processors to allow us to deliver our services to you. More information on each of our current data processors is below.

Realex

Any online payments are processed securely via **Global Payments (Realex)**.
View the Realex privacy notice [here](#)

Survey Monkey

Our post-event and service feedback is collected using surveymonkey.com, a standard feedback online platform. As a default, responses are recorded anonymously. Where users choose to submit their contact details (usually name, email address and telephone number) at the end of the survey, these will be stored securely on our Survey Monkey account. Individual responses to surveys can be deleted by request.
View the Survey Monkey privacy notice [here](#):

Mondo Marketing

Our printed season brochures are distributed by mailing as part of our contract with marketing agency Mondo Marketing. If you choose to receive postal mail from us including the season brochure, we will send them your name and postal address. Data is deleted after the completion of each mailing job.

MailChimp

Our email communications are processed via mailchimp.com (an industry-standard bulk email system) in order to maintain your subscription. If we email you to collect post-event feedback or if you choose to receive marketing emails from us, MailChimp will hold your name and email address, as well as records of emails we have sent to you and your activity within these emails. All email communications via mailchimp.com will provide you with a means to unsubscribe from further feedback collection and marketing email communications from us.

View the MailChimp privacy notice [here](#)

We ensure that our third-party service providers who handle data outside the UK or EU, for example through data servers or relays, adhere to the [EU-US Privacy Shield](#).

MAINTAINING YOUR PERSONAL INFORMATION

We store your personal information 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, please use the contact details at the end of this policy. Customer data on Ticketsolve and MailChimp will be removed after 6 years of customer inactivity. Any contact details submitted to Survey Monkey will be deleted after 1 year.

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.

SUBJECT ACCESS REQUESTS AND THE RIGHT TO BE FORGOTTEN

Under the GDPR, you may at any time request a copy of the information we hold on you by contacting us or ask for rectification of inaccurate personal details. You can also request the erasure of your personal data in any of the specific circumstances set out in [Article 17](#) of the GDPR. 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.

We can be contacted at the following address:

The Spring Arts & Heritage Centre
56 East Street
Havant
PO9 1BS

By phone on 02392 472 700, or email info@thespring.co.uk

The Data Protection Officer is Sophie Fullerlove, Director.

We may review and update this Privacy Policy. This version is current from 20 October 2020.

The Privacy Policy forms part of The Spring's internal Data Protection Policy, which is reviewed annually by the Trustees.