

## **Bear Pit Theatre Data Protection Policy**

### 1. Policy Statement

The Bear Pit Theatre is committed to protecting the personal data of our employees, volunteers, customers, and supporters. We will process personal data in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

### 2. Scope

This policy applies to all personal data processed by the Bear Pit Theatre, both in manual and electronic form.

### 3. Definitions

- Personal data: any information relating to an identified or identifiable natural person.
- Processing: any operation performed on personal data, such as collection, recording, storage, retrieval, use, disclosure, erasure, or destruction.

### 4. Data Protection Principles

We will comply with the following data protection principles:

- Personal data will be processed lawfully, fairly, and transparently.
- Personal data will be collected for specified, explicit, and legitimate purposes.
- Personal data will be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- Personal data will be accurate and, where necessary, kept up to date.
- Personal data will be kept for no longer than is necessary for the purposes for which it is processed.
- Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

### 5. Lawful Basis for Processing

We will only process personal data on one or more of the following lawful bases:

- Consent: the individual has given clear consent for us to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract we have with the individual.
- Legal obligation: the processing is necessary for us to comply with the law.
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary for us to perform a task in the public interest or for our official functions.
- Legitimate interests: the processing is necessary for our legitimate interests, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

### 6. Rights of Individuals

We will uphold the rights of individuals under the GDPR, including the right to:

- Be informed about how we use their personal data.
- Access their personal data.
- Rectify inaccurate personal data.
- Erase their personal data (the "right to be forgotten").
- Restrict processing of their personal data.

- Data portability.
- Object to processing of their personal data.
- Not be subject to automated decision-making including profiling.

#### 7. Data Security

We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- Encryption of personal data.
- Ability to ensure ongoing confidentiality, integrity, availability and resilience of processing systems and services.
- Ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident.
- Regular testing, assessing and evaluating of the effectiveness of technical and organisational measures for ensuring the security of the processing.

#### 8. Data Breaches

In the event of a data breach, we will notify the Information Commissioner's Office (ICO) within 72 hours, if the breach is likely to result in a risk to the rights and freedoms of individuals. We will also notify affected individuals without undue delay.

#### 9. Data Protection Officer (DPO)

We have appointed a DPO who is responsible for overseeing compliance with this policy and data protection legislation.

DPO Contact Details:

Name: Roger Ganner

Email: [roger.ganner@thebearpit.org.uk](mailto:roger.ganner@thebearpit.org.uk)

#### 10. Review

This policy will be reviewed annually or sooner if required due to changes in legislation or circumstances.

This policy was last reviewed on 22 May 2024

Signed:

Chair of Trustees