



Festival of Fools Privacy Policy

Festival of Fools is committed to protecting your personal information and being transparent about what information we hold about you on file. We use your personal data to provide our services to you. In particular, we will use information we hold about you to:

- Advertise and promote the festival
- Publish newsletters
- Undertake research and fundraising
- Use CCTV to protect our premises

It allows us to develop a better understanding of you and in turn provide you with relevant and timely information about the work that we do. As a charity, it also helps us engage with potential donors and supporters.

When we talk about data and personal data in this policy, we mean personal data which identify you or which could be used to identify you such as your name and contact details. It may also include information about how you use our website and mobile applications.

We have described how we collect, store and use your data in this Privacy Notice. There are steps you can take to control what we do with your data and this policy will explain your rights and the actions you can take. Under current legislation we are not obliged to employ a Data Protection Officer however, we have internal policies and procedures to govern the way we respond to your data requests and any changes to your preferences regarding the way we use your personal data.

If you have any questions about this policy, please write to us at Festival of Fools, Belfast Circus, 23-25 Gordon Street, Belfast BT1 2LG.

1. Who is responsible for your data

Festival of Fools is responsible for your data, with some data processing taking place by employees of Belfast Community Circus School. Our registered address is Belfast Circus, 23-25 Gordon Street, Belfast BT1 2LG. We are registered as a charity under Northern Ireland Charity Numbers NI058177 (Festival of Fools) and NIC100116 (Belfast Community Circus School) and UK Registered Charity Numbers XR98177(Festival of Fools) and XR34226 (Belfast Community Circus School). Festival of Fools is funded by the Arts Council for Northern Ireland as well as various other sponsors, donors and supporters. Festival of Fools is the data controller of the data which we collect from you, and as such we control the ways your personal data are collected and the purposes for which your personal data are used.

2. Personal data we collect from you

Depending on how you use our services and our websites, we might collect the following kinds of information about you:

Your name and contact details
(email address, telephone number, address)

- When you complete our audience survey
- When you make a donation to us

More sensitive information about you and about your health

(see information below about ‘Sensitive personal data’)

- If you are involved in any accident at one of our performances

Communication we have with you
(emails, letters, telephone calls, newsletters, messages sent to us through our social media platforms, feedback)

- When you get in touch with us
- When you respond to our requests for feedback
- When you opt in to receive our emails and newsletters
- When you comment on our social media

Information about your activities in our premises

- We use CCTV in our premises as a security measure

Information about you, your device, your location and how you use our website, mobile application, in-house wifi, information about your interests and preferences

See more information below under the heading ‘How we use your data to personalise the service we offer you’

- When you use our digital systems and services
- When you accept our cookies placed on your device
- When you update your account information
- When you open our marketing emails
- When you click on our banner adverts
- When you fill in forms on our website
- When you get in touch with us
- When you respond to our requests for feedback
- When you opt in to receiving emails and newsletters from us

Payment details

Your details are stored and protected in accordance with best industry practice

- When facilitating payment by card or invoice

Sensitive personal data

Certain kinds of personal data, such as data about your racial or ethnic origin, your physical or mental health, your religious beliefs or alleged commission or conviction of criminal offences, are special categories of personal data which by law require additional protection. We try to limit the circumstances in which we collect sensitive personal data of this kind, but we do collect and process it for specific purposes for example:

- You have requested special assistance
- You have been involved in an accident

- You have specified a requirement which implies or suggests your religion
- You are employed in a role which requires an Access NI certificate

By providing any sensitive personal data, you explicitly agree that we may collect it and use it to provide services to you.

3. How we use your personal data

We can only use your personal data if we have a proper reason for doing so. According to the law, we can only use your data for one or more of these reasons:

- To fulfil a contract we have with you, or
 - If we have a legal duty to use your data for a particular reason, or
 - When you consent to it, or
 - When it is in our legitimate interests.
- Legitimate interests are our business or commercial reasons for using your data, but even so, we will not unfairly put our legitimate interests above what is best for you.

In the table below, we have set out the different ways in which we use your personal data and the reasons we rely on for using that data. If we rely on our legitimate interests for using your personal data, we will explain that to you.

What we use your personal data for	Legal grounds for using it	Our legitimate interests
<ul style="list-style-type: none"> • To provide services to you <p>Communicating with you and to send you information about the service we provide to you</p>	<p>Fulfilling contracts</p> <p>Our legitimate interests</p> <p>With your consent</p>	<p>Keeping our records up to date, working out which of our products and services may interest you</p> <p>Developing products and services and what we charge for them</p> <p>Identifying or defining types of customers for new products of services</p> <p>Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties</p>
<ul style="list-style-type: none"> • To communicate with you and manage our relationship with you <p>To personalise and improve your customer experience</p> <p>To understand your preferences and purchasing behaviour</p> <p>To inform you about our</p>	<p>Fulfilling contracts</p> <p>Our legitimate interests</p> <p>With your consent</p>	<p>Keeping our records up to date, working out which of our products and services may interest you</p> <p>Developing products and services and what we charge for them</p> <p>Identifying or defining types of customers for new</p>

<p>news, offers, fundraising and impact of donations that we think you might be interested in (See more detail below under the heading ‘How we use your data to personalise the service we offer you’)</p>		<p>products, campaigns or services Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties</p>
<ul style="list-style-type: none"> To meet our health and safety responsibilities <p>To meet our responsibilities regarding security and safeguarding To support the relevant public bodies and authorities</p>	<p>Fulfilling contracts Our legitimate interests Our legal duty</p>	<p>Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties Identifying ways to improve the way we deliver services to our customers and students</p>
<ul style="list-style-type: none"> To detect, investigate and seek to prevent fraud and financial crime <p>To manage risk for us and our customers To obey laws and regulations which apply to us and the way we deliver our services To respond to complaints and to seek to resolve them</p>	<p>Fulfilling contracts Our legitimate interests Our legal duty With your consent</p>	<p>Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties Identifying ways to improve the way we deliver services to our customers and students</p>
<ul style="list-style-type: none"> To run our business in an efficient and proper way <p>To fulfil our administrative purposes including admissions, academic records, accounting, billing and audit To improve our services To manage how we work with other companies, organisations and institutions that provide goods and services to us and our customers To protect our business interests</p>	<p>Fulfilling contracts Our legitimate interests Our legal duty</p>	<p>Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties Identifying ways to improve the way we deliver services to our customers and students</p>
<ul style="list-style-type: none"> To develop and manage our brand, products and services 	<p>Fulfilling contracts Our legitimate interests Our legal duty</p>	<p>Being efficient about how we fulfil our contracts, provide our services and fulfil our</p>

To test new products and services		legal duties Identifying ways to improve the way we deliver products and services to our customers and students
<ul style="list-style-type: none"> To carry out targeted fundraising and utilise donor profiling processes on current donors and ticket-buyers 	Fulfilling contracts Our legitimate interests Our legal duty	Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties Identifying ways to improve the way we deliver products and services to our customers and students Providing transparency about our services

4. How we use your data to personalise the service to you

We use the data we collect about you from different sources and touch points to try to understand more about you and your preferences, so that we can personalise the service we offer to you. We use information collected from the forms on our website and bookings you have made and from cookies. Cookies are small pieces of information stored on your device by the web browser of your device. We use cookies placed on your devices to collect data about your use of our website. We also use data from third parties (see ‘Sharing your data’ below). We use the information from these different sources in the following ways:

- To help us communicate with you.
- To identify your likes and dislikes.
- To understand more about your preferences and your purchasing habits.
- To help you complete a booking.

5. How you can manage the marketing messages we send to you

Our marketing communications include information about our new and existing services, special offers we think you might like and fundraising campaigns or news on the impact of donations which we think might be interesting to you. We may send you marketing communications by email if you have indicated that you are happy to receive such emails by opting in.

If you have previously received emails from us and no longer wish to receive them you can also opt out by clicking on the unsubscribe link which we include in all our marketing emails. Please note that if you tell us that you do not wish to receive marketing emails, you will still receive service emails which are necessary for example to confirm your booking or to update you on a cancellation of a show. This is so that we can perform the contract we have with you.

6. How long we keep the data

We keep your data only for as long as we need it. How long we need data depends on what we are using it for, whether that is to provide services to you, for our own legitimate interests (described above) or so that we can comply with the law.

We will actively review the information we hold and when there is no longer a customer, legal or business need for us to hold it, we will either delete it securely or in some cases anonymise it.

Some of our policies are only for internal use: our Data and Retention Policies are in place to govern this and will be kept under regular review to ensure best practice is followed.

7. How we protect your data

We protect your personal data against unauthorised access, unlawful use, accidental loss, corruption or destruction.

We use technical measures such as two-step authentication, encryption and password protection to protect your data and the systems they are held in. We also use operational measures to protect the data, for example by limiting the number of people who have access to the databases in which our information is held. All personal data in paper format is held confidentially in lockable storage with limited access.

We keep these security measures under review and refer to industry security standards to keep up to date with current best practice.

8. Sharing your data

We share some of your personal data with, or obtain personal data from, the following third parties:

- We may share your personal data with safety standard organisations, like Health and Safety Executive in the event of an accident.
- We use Google Analytics, YouTube, Vimeo, Facebook, Twitter, Instagram, Hootsuite and Dotmailer and Mailchimp to deliver our promotional and marketing content and analyse the way our content is accessed by our audiences. Please note as a user of any of these services you can also control your preferences within your account with them. Festival of Fools is only responsible for our own content and not content provided by third parties working for or with Festival of Fools or Belfast Circus.
- For contractual reasons we may have to share data with some funders. We will always tell you when we need to do this.

9. Sending data outside of the European Economic Area (EEA)

We will only send data outside of the European Economic Area ('EEA') to work with our service providers who we use to deliver services to you or to comply with a legal duty. If we do transfer data outside the EEA, we will make sure that it is protected in the same way as if it were being used in the EEA. We will use one of the following safeguards to ensure that it is protected:

- Transfer the data to a non-EEA country which has privacy laws at least as protective as those within the EEA
- Put in place a contract with the recipient of the data which means the recipient must protect the data to the same standards as required within the EEA, or
- Transfer it to organisations which are part of the Privacy Shield. The Privacy Shield is a framework which sets out the standards for data to be sent between the United States and European countries. The Privacy Shield ensures that data is protected to the same standards as used within the EEA.

10. Your rights

You are entitled to see copies of all personal data held by us and to amend, correct or delete such data. You can also limit, restrict or object to the processing of your data.

If you gave us your consent to use your data, e.g. so that we can send you marketing emails, you can withdraw your consent at any time. Please use the unsubscribe button included on all our emails.

You can object to our use of your data where we rely on our legitimate interests to do so. We explained the legitimate interests we rely on in the table (page 3 refers) under the heading '**How we use your personal data**' and in '**How you can manage the marketing messages we send to you**'

To raise any objections or to exercise any of your rights, you can write to us at Festival of Fools, Belfast Circus, 23-25 Gordon Street, Belfast BT1 2LG.

When you get in touch, we will come back to you as soon as possible and where possible within one month. There is no charge for most requests, but if you ask us to provide a significant amount of data for example we may ask you to pay a reasonable admin fee. We may also ask you to verify your identity before we provide any information to you.

If Festival of Fools decides to change this Privacy Policy, the changes will be posted on this page.

11. Complaints

If you have any complaints concerning Festival of Fools' processing of your personal data please write to us at Festival of Fools, Belfast Circus, 23-25 Gordon Street, Belfast BT1 2LG.

Please note that you have the right to lodge a complaint with the Information Commissioner's Office which is responsible for the protection of personal data or if you think a breach of data protection laws might have taken place. You can contact the Information Commissioner's Office by telephone on 0303 123 1113, or by using the live chat service which is available through the Information Commissioner's website www.ico.org.uk.

12. Contacting us

If you have any questions please write to us at Festival of Fools, Belfast Circus, 23-25 Gordon Street, Belfast BT1 2LG.

18th January 2019