



1. Privacy Statement

We are committed to safeguarding and preserving the privacy of our audiences, followers and those we communicate with.

Individuals have the right to know what personal data we hold about them, how we store and use it, and why. This Privacy Statement explains this, and the rights of individuals, regarding this data.

This policy is reviewed annually, or as required, in order to ensure that the terms are current, fair and representative of relevant legal, industry and other relevant conditions.

2. Information We Collect and Why

Audiences and Supporters

Individuals are considered to be 'Audiences and Supporters' when they purchase tickets for our productions and provide personal information, or when they respond to surveys or other feedback requests. Individuals may provide consent to a venue where they have purchased a ticket/s for this data to be shared with us. When we receive an individual's data from a venue, we will contact that individual within 90 days of receiving their data, to inform them that we are holding this data and how we plan to use it, giving opt-out options from receiving any further communications.

Individuals may provide data when they purchase a ticket/s directly from us, or from a third-party ticketing platform (for example TicketCo). When we receive an individual's data from a direct ticket purchase, or from a third-party ticketing platform, we will contact that individual within 90 days of receiving their data, to inform them that we are holding this data and how we plan to use it, giving opt-out options from receiving any further communications. In this first communication, we may invite individuals to take part in post-event surveys or opt in to a mailing list.

When tickets for our events are purchased via a third-party ticketing platform such as TicketCo, we are the Data Controller and TicketCo are the Data Processor. We have entered into a data sharing agreement with TicketCo. To find out more about how TicketCo stores and processes data, see their [Privacy Policy](#).

We are a National Portfolio Organisation funded by Arts Council England and have entered into mutually agreed data sharing agreements with other Arts Council-funded organisations. To find out more, please read [Arts Council England's data sharing and requirements for national portfolio organisations](#).

Audience data we hold will usually be limited to name and email address. Occasionally, where it is provided, we will also hold postal addresses. We will store the data, including their booking patterns and preferences, on a digital, password-protected database. We will also utilise Google Drive to store and process this data. For further information, see [Google's Privacy Policy](#). We will limit access to this data to a minimum number of company employees who require access to the data to carry out their jobs.

We will use this data to contact those individuals inviting them to take part in surveys, with information about future imitating the dog events and opportunities to support imitating the dog. We never pass this information on to other organisations.

Our lawful basis for holding and processing this information is consent given to us either directly, or via a third party opt-in option provided by the venue at the point of booking. Individuals will be expressly asked for this consent and have the right to decline it.

People who work with us

We keep a database of relevant people who work with us or have worked with us, or who we might work with in the future, or who are of another legitimate interest to the company. This includes, but is not restricted to: board members, staff, volunteers, producers, casting directors, designers, directors, technicians, performers, photographers, film-makers, education specialists, administrators and other freelance professionals and service providers.

We hold information on our database on these individuals which includes name and contact details as a minimum, and sometimes other data such as their photograph or personal data such as date of birth and other information, required for example by Companies House, pension providers or HMRC or monitoring information required for our funders. In relevant cases, we hold employment details and payment details which have been supplied to us by those individuals, for example employment contracts and copy invoices. We share some of this data, such as copy invoices, with the company accountant, Andon Freres.

The above data of the people who work with us, or have worked with us, is held in password-protected computers. We also store this information in a third-party processor, Dropbox, which can only be accessed by company directors and any company Producer or Administrator. To find out more, see [Dropbox's Privacy Policy](#). Our lawful basis for holding and processing this information is the provision of consent by the individual to do so, or legal obligation.

Participants

As part of our creative engagement work, imitating the dog works regularly with participants on a voluntary, non-professional basis. Participants are defined by Arts Council England as “people who directly participate in an activity, for example sing in a choir, perform in a play or take part in a workshop”. We typically hold information for participants such as their name, contact details and monitoring information, and such data is secured electronically as outlined above but in this instance accessed also by the Creative Engagement Manager who leads on our engagement work, and any freelance engagement personnel under their direction who is required to contact participants. Data is held for participants on the basis of consent. Note for those 17 and under such consent is required from a legal parent or guardian. Participants may include children and vulnerable adults who are subject to separate safeguarding provisions (see our *Safeguarding Children & Adults at Risk Policy & Procedure*) which may include specific instructions around the use of their image and likeness in any documentation; such instructions are always observed in order to protect their safety.

Industry Contacts

We hold the contact details of some industry colleagues, including programming and other representatives of theatres and other venues, and of educational institutions and other bookers. The information we hold is name, email address and telephone numbers, and the organisation that the individual represents, and their job title. We use this information to contact these people as part of our business. Our lawful basis for holding and processing this information is legitimate interest.

Mailing Lists

Reviewed: Oct 25 *(note board approval is pending)*

When individuals subscribe to our newsletter, we collect their name and email address, which we use to keep them informed about our productions and activities, any services we offer and opportunities to support us. We never pass this information on to other organisations. We also collect location and time-zone data to better understand our subscribers and where they are.

Individuals will only be added to our mailing list when they ask to be added and can unsubscribe from our newsletter at any time by clicking the unsubscribe link at the bottom of any of our emails. When individuals unsubscribe, we will remove their personal information within 30 days of the request.

We use MailChimp for all our mailouts and they act as the data processors for this information. To find out more, please read [MailChimp's Privacy Policy](#).

Website

Via our website we may automatically collect and process the following data:

- Information about use of our site including details of visits such as pages viewed, length of visit and the resources accessed. Such information includes traffic data, location data and other communication data. This information does not identify users in any way.
- Information provided voluntarily by individuals, for example, when registering for information.
- Information that is provided when communicating with us by any means.

Cookies

Cookies provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information in order to assist us in improving our website.

We may gather information about website visitor's general internet use by using the cookie. Where used, these cookies are downloaded to the website visitor's computer and stored on the computer's hard drive. Such information will not identify the website visitor personally. It is statistical data. This statistical data does not identify any personal details whatsoever.

Individuals can adjust the settings on their computer to decline any cookies if they wish, by activating the reject cookies setting on their computer.

Third Party Links

On occasion we include links to third parties on our website or in mailings. Where we provide a link, it does not mean that we endorse or approve that site's policy towards visitor privacy. Individuals should review their privacy policy before sending them any personal data.

Performance Data

imitating the dog makes video-based artworks which commonly feature static or moving image and/or audio recordings of the image, likeness and/or voice of performers who may, depending on the nature of the project, be professional actors and non-professional participants.

This data is classed as personal data as it contains information which may allow for the performer to be identified. In the case of: professional actors, performance data is processed through the lawful basis of contract; and for participants, performance data is processed through the lawful basis of consent. In both cases, the terms of engagement are communicated clearly in writing to the data subject in advance outlining imitating the dog's plans to publicly present the work featuring their data and their data subject rights.

3. How we collect and use data

Personal Data

We only collect and store personal data which individuals have provided to us, or where it is a legal requirement, or where we can demonstrate legitimate interest. We will ask to collect data when individuals and organisations enquire or register to take part in imitating the dog activities, events, work with us or volunteer with us, or subscribe to a newsletter or similar service.

We will collect and process data from third parties such as venues, where the individual has consented for this data to be shared with us.

The sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data that individuals choose to send us electronically. Sending such information is entirely at individuals' own risk.

We will only use an individual's personal information with their consent, or where it is necessary to:

- enter into a contract with them
- comply with a legal duty
- protect their vital interests
- use for our own (or a third party's) lawful or legitimate interests, provided their rights don't override these

We may use an individual's information in a variety of ways including to:

- Send them information about our latest news, productions, projects, activities, events and opportunities to support us via our e-newsletters, post and email
- Process their registration to an activity or event
- Maintain our database of supporters and people that have attended training, productions and events
- Process orders and purchase of products or services
- Carry out research and analysis of audiences and supporters to better understand patterns and trends, how we could better communicate with people and to provide feedback to our funding partners and other partners and stakeholders, and to imitating the dog's Board of Directors
- Record any donations that individuals make to us, including when and how much they gave
- Update an individual's information to respect their choices and preferences

Performance Data

Depending on the circumstances, processing of performance data may define as 'special category processing' under UK GDPR which is subject to stricter rules. In any case imitating the dog will ensure that such rules are adhered to by giving the performer the right to stop or limit processing of data outlined in Section 4.

3. How we protect data

We take the security of our individuals' personal information seriously and take appropriate steps to ensure all data is securely stored. We store physical and electronic data. Physical data is stored in one of our company offices, or with any Producer / Administrator or Accountant, or by any Stage Manager on tour. Electronic data and databases are stored on secure computer systems, and the third-party processors outlined below. In all cases we control who has access to this information. All of our computers are password-protected.

Personal information is only accessible to authorised personnel and all personal information is transferred using secure processes. All staff work in accordance with the procedures outlined in this Privacy Statement when handling personal data.

Use of third party processors and storage

We use the following third-party processors to store and process data:

MailChimp [MailChimp's Privacy Policy](#)

Dropbox [Dropbox's Privacy Policy](#)

Google Drive and Gmail [Google's Privacy Policy](#)

TicketCo [TicketCo's Privacy Policy](#)

The service agreements imitating the dog has in place with each of the above third parties include a data processing agreement. They all outline that imitating the dog is a data Controller and the third party (e.g. Mailchimp) is a data Processor. The Controller is the owner of data while the Data processor handles data on behalf of the Controller.

4. Disclosing, Retaining and Removing Information

We will not disclose any individual's personal information to any other party other than in accordance with this Privacy Policy and in the circumstances detailed below:

- Where we are legally required by law to disclose an individual's personal information
- To further fraud protection and reduce the risk of fraud
- For our own (or a third party's) lawful or legitimate interests
- If there was an overriding need eg if there was an emergency at an event we were running.

We will delete information from our files, from our databases and / or unsubscribe individuals from further communications on request, and in a timely manner.

We will review all data we hold on an annual basis and if it is no longer of legitimate interest for us to hold, we will delete it. Therefore, all data will be held until it is requested to be removed, or until it is no longer of legitimate interest to us.

Performance data becomes part of imitating the dog's portfolio of creative work and the company make documentation assets available on their website and other public-facing platforms (e.g. social media) for profile-raising purposes. Whether a performer's data can be erased depends on how the data was processed. If it was processed via consent, the data subject can withdraw their consent at any time and request its erasure. If it was acquired on the basis of contractual necessity, the data subject cannot withdraw their consent as it was not acquired via consent originally, rather through contract, but only if the contract outlined explicit terms around use of performance data in the first place.

Processes for Dealing with Data Breaches

All cases of suspected or reported data breach will be investigated in a timely manner. The suspected breach will be passed to our company's data protection officer, who will respond according to procedure.

5. Further Information

Information, Rights & Framework

imitating the dog's Data Protection Officer is the Executive Director.

Reviewed: Oct 25 (*note board approval is pending*)

This Statement is developed within the following legal and governing framework:

- General Data Protection Regulation (GDPR), a set of EU-wide data protection rules applicable from 2018 in the UK and retained post-Brexit as a UK law (UK GDPR)
- UK Data Protection Act 2018, which compliments UK GDPR
- [the](#) Information Commissioner's Office (ICO), the UK's independent body for data protection and information rights, with whom imitating the dog is registered (reference: A8320280)
- Equity's guidance on performers' data in recorded media: Personal data, performances and GDPR

All personal data will be processed in accordance with the above.

Under UK GDPR, individuals have the right to view or ask us to amend or delete the personal information that we hold about them. Such a request should be made via email to thedog@imitatingthedog.co.uk

More about people's data rights can be found on the [ICO website](#)

Individuals have the right to make a complaint if they think there is a problem with how we handle their data.

Complaints should be made to the [Information Commissioner's Office](#)

Please do not hesitate to contact us regarding any matter relating to this Privacy Statement at thedog@imitatingthedog.co.uk