



**The
Montgomery**

Privacy Policy

Welcome to our privacy policy; it applies between you, as the user of this website and **Montgomery Arts and Christian Centre Sheffield Ltd** trading as The Montgomery, the owner and provider of this website. The Montgomery takes the privacy of your information very seriously. This privacy policy applies to our use of any and all personal data collected by us or provided by you in relation to your use of the website.

The Montgomery respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also refer to the Glossary which provides further information as to the meaning of some of the terms used in this privacy policy.

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1 IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy aims to give you information on how The Montgomery collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase tickets or request to receive information or sign up to our subscription centre or request to be added to our mailing list or any similar activity.

This website is not intended for children and we do not knowingly collect or retain (if received) data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Montgomery Arts and Christian Centre Sheffield Ltd trading as The Montgomery is the controller and responsible for your personal data referred to as "The Montgomery", "we", "us" or "our" in this privacy policy.

Contact details: If you have any questions about this privacy policy or our privacy practices, please contact us at:

Email address: info@TheMontgomery.org.uk or

Postal address: The Montgomery, Surrey Street, Sheffield, S1 2LG

Telephone number: 0114 2720455

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to our privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, and (if applicable) store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes: billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes: payment (debit or credit) card details (**but we will never store or transfer your Financial Data**).
- **Transaction Data** includes: details about payments to and from you and other details of tickets or other products and services you have purchased from us.
- **Technical Data** includes: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes: your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes: information about how you use our website, products and services.
- **Marketing and Communications Data** includes: your preferences in receiving marketing from us and our third parties and your communication preferences.

Personal data or personal information which we collect about an individual will be retained by us for 18 months.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade

union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you (for example if you purchase a ticket), and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel the contract (in the example given, we would not be able to sell you the ticket) but we will notify you if this is the case at the time.

3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise in the course of any communication or interaction between you and us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please refer to our cookie policy, which is set out in our Terms and Conditions (which you can find on our website) for further details.

4 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances, and for the following and always in accordance with this privacy policy:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- To provide you our goods or services, and to improve them where appropriate.
- Sending you promotional materials or other information that we believe may be of interest to you.
- Contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update our website

Please refer to the Glossary below to find out more about the types of lawful basis that we will rely on to process your personal data.

Where required, we may rely on consent as a legal basis for processing your personal data. In particular we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right at any time to contact us (as above) to withdraw consent to marketing or any other consent previously given.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data in any particular case.

Marketing and promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party Marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us using any of the **Contact details** set out above.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Please refer to our cookie policy, which is set out in our Terms and Conditions (which you can find on our website) for further details.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using any of the **Contact details** set out above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes described in "**How we use your personal data**" above.

- External Third Parties as described below.
- Third parties to/with whom we may choose to sell, transfer or merge parts of our organisation, activities or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6 INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

7 DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements (which may require retention of data for longer periods). Generally, in practice this will mean that we will retain your personal data for 18 months

In some circumstances you can ask us to delete your data: see “**Your legal rights**” below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9 GLOSSARY

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at any of the **Contact details** set out above.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

External Third Parties include:

- Service providers who provide IT and system administration services.
- Professional advisers, market researches and others providing consulting, advisory or similar services to us.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who may require reporting of processing activities in certain circumstances.

10 YOUR LEGAL RIGHTS

You have the right to:

1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.