



## Privacy Policy

Written 21/03/2018

Preservation of your privacy is important to London Children's Ballet and we are committed to letting you know how we use your personal information and to making only responsible use of your data.

References to "we", "us" or "our" in this Privacy Policy are references to London Children's Ballet, a charitable incorporated organisation registered in England and Wales, registered charity number: 1165961.

We may change this document from time to time. Please check back frequently; you will be able to see if changes have been made by the date it was last updated.

### What personal data we collect

#### What we need

London Children's Ballet is what's known as the 'controller' of the personal data you provide to us. We usually collect personal data about you like your name, postal address, telephone number, email address and, if you are supporting us financially, your bank details.

Sometimes we will collect other information about you such as your date of birth, gender and health details. We will be very clear with you when we wish to collect such information, our reason for collecting such information. We would only do so with your specific consent and permission.

#### Why we need it

We collect your personal data in connection with specific activities, such as audition and company registration, newsletter requests, membership requests, event registration, product and ticket purchases, training programme registration, feedback, donations, information you provide in public forums on our sites and applications.

We require the information either to fulfil your request or enable us to provide you with a more personalised service, such as respecting your preferences for being contacted by us.

You do not have to disclose any of this information to browse our website. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

### How we obtain your details

We collect your personal information in a number of ways

- When you provide it to us directly.
- When you provide permission to other organisations to share it with us.
- When you have given it to a third party and you have provided permission to pass your information on to us.
- From publicly available sources (where possible) to keep your information up to date (e.g. the Post Office's National Change of Address database).

We combine the information from these sources with the information you provide to us directly.

When providing permission for third party organisations to share your data, you should check their Privacy Policies carefully to understand fully how they will process your data.

## How we use it

From time to time, with your consent, we will process your personal data to provide you with information about our work or our activities that you have requested or are expecting.

On other occasions, we may process personal data when we need to do this to fulfil a contract or where we are required to do this by law or other regulations.

We also process your data when it is in our legitimate interests to do this and when these interests do not override your rights. Those legitimate interests include providing you with information on our performances, appeals, membership, services, products, fundraising, newsletter requests, feedback, training programmes and other activities. Please see the section on Legitimate Interest for more information.

### Building profiles of supporters

We may make use of profiling and screening methods to produce relevant communications and provide a better experience for our supporters. Profiling can help us target our resources more effectively through gaining an insight into the background of our supporters and help us to build relationships that are appropriate to their interests and capacity to give.

To do this we may use additional external sources of data to increase and enhance the information we hold about you. This may include obtaining details of changes of address, telephone numbers and other contact details and information related to your wealth. It may also include information from public registers and other publicly available sources such as Companies House, newspapers and magazines.

If you do not wish your data to be used in any of the ways listed above or have questions about this then please contact us at [admin@londonchildrensballet.com](mailto:admin@londonchildrensballet.com).

### Children

If you are under 18, please ensure you obtain your parent's/guardian's consent before sending any personal information to any website or London Children's Ballet.

Please note that we will not knowingly market to or accept donations or orders for goods or services from persons aged under 18 years.

As a parent or guardian, we encourage you to be aware of the activities in which your children are participating, both offline and online. If your children voluntarily disclose information, this may encourage unsolicited messages. We suggest that you discourage your child from providing any information without your consent.

LCB dancers can make subject access requests for their own personal data, provided that, in the reasonable opinion of LCB, they have the sufficient maturity to understand the request they are making. A dancer of any age may ask a parent or representative to make a subject access request on his/her behalf. Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of young dancers, the law still considers the information in question to be the child's.

The rights under Data Protection Law belong to the individual to whom the data relates. However, LCB will rely on parental authority or notice for the necessary ways it processes data relating to the children they work with.

Where consent is required, it may in some cases be necessary or appropriate - given the nature of the processing in question, and the child's age and understanding, to seek the child's consent.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

However, where a child seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, LCB may be under an obligation to maintain confidentiality unless, in LCB's opinion, there is a good reason to do otherwise; for example, where LCB believes disclosure will be in the best interests of the child or other children, or if required by law.

### Anything else

All the personal data we process is processed by our staff in the UK. However, for the purposes of IT hosting and maintenance, your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

If at any time you would like to change the way you hear from us or no longer wish to receive direct marketing communications from us, please let us know at [admin@londonchildrensballet.com](mailto:admin@londonchildrensballet.com)

### Sharing Your Information

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security taxations, for criminal investigations and for the following:

- If you have agreed that we may do so.
- When we use other companies to provide services on our behalf, e.g. processing, mailing or delivering orders, sending mail and emails, when using auditors/advisors or processing credit/debit card payments.
- If we receive a complaint about any content you have posted or transmitted to or from one of our sites, to enforce or apply our Terms and Conditions or if we believe that we need to do so to protect and defend the rights, property or personal safety of London Children's Ballet, our websites or our beneficiaries and for other lawful purposes.
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your data when you register.

We will never sell or rent your personal information to other organisations.

### Retaining your information

We hold your information only as long as necessary for each purpose we use it.

If you decide that you no longer wish to support London Children's Ballet or request that we have no further contact with you, we will keep some basic information in order to avoid sending unwanted materials in the future and to ensure we do not accidentally duplicate information.

### Security

We will take reasonable precautions to prevent the loss, misuse or alteration of information you provide.

Communications may be sent by e-mail. For ease of use and compatibility, communications (other than payments where applicable) will not be sent in an encrypted form unless you require it and provide the certification to enable us to communicate with you in that way. E-mail unless encrypted is not a fully secure means of communication. Whilst we endeavour to keep our systems and communications protected against viruses and other harmful effects, we cannot bear responsibility for all communications being virus-free.

No credit card details will be kept at any time. Hard copy details provided will be redacted and/or shredded upon completion of the individual transaction.

## What are your rights?

A new data protection law, starting on 25 May 2018, gives everyone a number of very important rights. These are the right to:

- Transparency over how we use your personal information (**right to be informed**).
- Request a copy of the information we hold about you, which will be provided to you within one month in most cases (**right of access**).
- Update to amend the information we hold about you if it is wrong (**right of rectification**).  
Ask us to stop using your information (**right to restrict processing**).
- Ask us to remove your personal information from our records (**right to be forgotten**)
- Object to the processing of your information for marketing purposes (**right to object**).
- Obtain and reuse your personal data for your own purposes (**right to data portability**).
- Not be subject to a decision when it is based on automated processing (**automated decision making and profiling**).

If you would like to know more about your rights under the data protection law, please see the Information Commissioners Office [website](#).

Remember you can change the way you hear from us or withdraw your permission for us to process your personal data at any time by letting us know at [admin@londonchildrensballet.com](mailto:admin@londonchildrensballet.com)

## How to contact us

If you wish to talk through anything in our Privacy Policy, find out more about your rights or obtain a copy of the information we hold about you, please contact our office (details at the bottom of this page) who will be happy to help. If you wish to raise a complaint on how we have handled your personal data, you can contact us directly. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Fundraising Regulator or the Information Commissioner's Office (ICO).

London Children's Ballet  
73 St Charles Square  
London  
W10 6EJ

Tel: 020 8969 1555

Email: [admin@londonchildrensballet.com](mailto:admin@londonchildrensballet.com)

Links within our sites to other websites are not covered by this privacy policy.

PLEASE READ THIS PRIVACY STATEMENT IN CONJUNCTION WITH OUR WEBSITE'S TERMS AND CONDITIONS.

## Legitimate interests

Under the new data protection law starting on 25 May 2018, we have a number of lawful reasons that we can use (or 'process') your personal information. One of the lawful reasons is called 'legitimate interests'.

Broadly speaking Legitimate Interests means that we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

When you provide your personal details to us we use your information for our legitimate business interests to carry out our work to increase access to ballet performance opportunities across Greater London. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

Some typical examples of when we might use the approach are for preventing fraud, direct marketing, maintaining the security of our system, data analytics, enhancing, modifying or improving our services, identifying usage trends and determining the effectiveness of our campaigns and fundraising.

## Our mission and objectives

The mission of London Children's Ballet is to:

- give unique, free performance opportunities to talented young dancers from all backgrounds.
- give career-shaping commissions to emerging artists, especially composers, choreographers and designers.
- introduce ballet to those who could not otherwise afford it.
- take ballet performances and workshops to the most isolated in society, especially those who find it hard or impossible to attend the theatre due to physical restrictions.

Beyond this stated mission, LCB's ambition to inspire the young people it works with is far broader. Our vision is to open doors to children, give them new horizons through dance, raise the expectations they have for themselves in dance or other areas of their lives and learn the life lesson of reward for commitment and hard work.

LCB will use various ways to achieve our mission and to support our objectives; we believe that people who share our values would love to know how to support us. We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service and products and provide the best and most secure experience. These are what we consider to be our 'Legitimate Interests'.

## Out interests

The following are some examples of when and why we would use this approach in our work helping young dancers:

- Direct Marketing: We will send postal marketing and fundraising asks which further the aims and objectives of LCB. We will also make sure our postal marketing is relevant for you, tailored to your interests.
- Ordering online: In order for us to process an order, payment has to be taken and contact information collected, such as name, delivery address and telephone number. The seller would also need to record the transaction.
- Your best interest: Processing your information to protect you against fraud.
- Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our supporters.
- Research: To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.
- Due Diligence: We may need to conduct investigations on supporters, potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

We will also hold information about you so that we can respect your preferences for being contacted by us.

### **Your interests**

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will 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 permitted to by law).