
DATA PROTECTION POLICY STATEMENT



1. INTRODUCTION

- 1.1. This document contains the policy statement and procedures of Live & Local Ltd. with respect to the Data Protection Act 1998 ('the DPA').
- 1.2. It is the responsibility of the Data Protection Officer to know and understand its content, so that they may implement the policy and educate staff and promoters about the policy.
- 1.3. Live & Local Ltd. is registered with the Information Commissioner to process personal data and is named as a data controller under the register kept by the Information Commissioner in accordance with section 19 of the DPA.

2. POLICY STATEMENT

- 2.1. Live & Local Ltd. is committed to ensuring that all data collected is protected and will only be used in accordance with this policy statement.
- 2.2. Live & Local Ltd. will ensure that:
 - Everyone managing and handling personal information understands that they are responsible for following good data protection practice;
 - There is someone with specific responsibility for data protection in the organization (see 1.2 above);
 - Staff who handle personal information are appropriately supervised and trained;
 - Methods of handling personal information are regularly assessed and evaluated;
 - Any disclosure of personal data will be in compliance with approved procedures;
 - All necessary steps are taken to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure.

3. WHAT IS COLLECTED & WHY

- 3.1. Live & Local Ltd. collects data information from potential and current audience members through paper and mobile mailing list subscription (sign-up) forms and audience surveys distributed at Community Touring Networkⁱ shows, Community Cinema Networkⁱⁱ film screenings and other events coordinated by Live & Local Ltd., through online registration and audience surveys, e-bulletin subscription, e-mail surveys, and from direct contact with the Live & Local Ltd. office (via e-mail, telephone or letter).
- 3.2. Live & Local Ltd. also collects and holds data information in relation to potential and current promoters and their colleagues. Other than where explicitly stated this policy covers this group in the same way.
- 3.3. Live & Local Ltd. also collects and holds data information in relation to potential and current funders, partner organisations, suppliers and other organisations who may be interested in our work along with Friends of Live & Local Ltd. Other than where explicitly stated this policy covers this group in the same way.
- 3.4. Live & Local Ltd. collects and holds personal data and sensitive personal data in relation to staff. Other than where explicitly stated this policy covers this group.
- 3.5. All data that is collected is adequate and relevant for its purpose.
- 3.6. Data providers are informed of how their data will be used and of their rights to their data.

- 3.7. This is what Live & Local Ltd. may collect with regards to data information:
- Name;
 - Contact information including postcodes and e-mail addresses;
 - Demographic information such as ethnicity, gender, age;
 - Behavioral information such as purchase patterns, preferences and interests;
 - Other information relevant to research, surveys and/or offers;
 - Photographs, audio, videos and other digital media;
 - Personal information about staff.
- 3.8. Live & Local Ltd. requires information from its subscribers, promoters and partners for the following reasons:
- Internal record keeping;
 - To improve its products and services;
 - Distribution by post of the seasonal What's On Brochures (twice per year at the beginning of each season: September and January) and direct-mail letters for the geographic areas selected;
 - Posting of an e-campaign at least once per month;
 - Ticket sales management;
 - Current and potential promoters will receive information about Live & Local Ltd.'s services, available shows and items relevant to their participation in the network;
 - Current and potential funders, partner and other interested organisations will receive information about Live & Local Ltd.'s services, current events and project programmes and other items relevant to their investment and/or interest in the organisation;
 - By joining Live & Local Ltd.'s mailing list, subscribers have agreed to receive information about Live & Local Ltd.'s live shows and film screenings, last-minute offers and news updates using the contact details provided.
- 3.9. Live & Local Ltd. requires information from its survey respondents for the following reasons:
- To improve its products, services, audience development and marketing;
 - To introduce new products and services;
 - To meet funding agreements and/or relevant legal requirements.
- 3.10. Live & Local Ltd. collects images, photographs, audio, video and other digital media files for the purposes of marketing, advocacy and documentation.
- 3.11. Live & Local Ltd. requires personal information from staff to comply with law and in accordance with other company policies.

4. HOW DATA IS STORED

- 4.1. Live & Local Ltd. stores the data on electronic databases. A person's data is stored until they write/email/telephone Live & Local Ltd. to request to be removed (unsubscribed). They will be removed from the electronic database within 30 days.
- 4.2. If an audience member writes to Live & Local Ltd. requesting to join the mailing list the paper record of this request is kept for 6 months and then securely destroyed.
- 4.3. Paper records relating to promoter groups are kept on file as long as necessary for the purpose for which it was gathered.
- 4.4. Live & Local Ltd. archives written correspondence for as long as is considered necessary.

- 4.5. Live & Local Ltd. stores images, photographs, and audio, video and other digital media files on a secure computer network. Digital media files may be released on the internet, for broadcast or in printed material to promote the aims and ideals of Live & Local Ltd. Parent/guardian consent to release digital media files of minors will always be sought.
- 4.6. Live & Local Ltd. stores sensitive personal data about staff in secure paper files with restricted personnel access. Records will be destroyed in accordance with the current legislation, and Live & Local Ltd.'s document retention policy.

5. SECURITY

- 5.1. Live & Local Ltd. is committed to ensuring that personal data is secure. In order to prevent unauthorised access or disclosure it has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information collected and stored.

6. CONTROLLING PERSONAL DATA

- 6.1. Live & Local Ltd.'s subscriber mailing list is opt-in. (Other than for those organisations and individuals that fall under clause 3.3 where it is opt-out). All data providers have the right to remove their data. Instructions for being removed from the mailing list are given at the bottom of every direct mail letter and e-mail campaign.
- 6.2. Subscribers' can opt-in to having their details passed on to performers / companies / promoters so that the subscribers can be kept informed about the performers / companies / promoters work.
- 6.3. If a subscriber has previously agreed that Live & Local Ltd. can pass on their personal information to its performers / companies / promoters they can change their mind at any time by writing to Live & Local Ltd., Pageant House, 2 Jury Street, Warwick, CV34 4EW or by e-mailing admin@liveandlocal.org.uk.
- 6.4. Live & Local Ltd. will not sell, distribute or lease personal information to third parties unless required to by law. Live & Local Ltd. will never send its subscribers promotional information about third parties.
- 6.5. All individuals and organisations in clauses 3.1 to 3.4 have the right to request details of the personal information held about them by Live & Local Ltd. under the Data Protection Act 1998. For external requests, a fee of £10 will be payable and subscribers must allow up to 30 days to receive the information. If subscribers would like a copy of their personal information they must write to: Live & Local Ltd., Pageant House, 2 Jury Street, Warwick, CV34 4EW.
- 6.6. If any person believes that any information Live & Local Ltd. are holding about them is incorrect or incomplete they should contact Live & Local Ltd. as soon as possible at the above address or e-mail admin@liveandlocal.org.uk. Live & Local Ltd. will promptly amend any information found to be wrong.
- 6.7. Every two years Live & Local Ltd. will contact audience mailing list subscribers, for whom it has held personal information for more than four years, to confirm that the information which is held for them is relevant and accurate. They will be asked to opt-in to the mailing list again if they wish to remain on the database.
- 6.8. Live & Local Ltd. will pass promoters' contact information to other promoters in the network and to the performers / companies they are promoting, within the terms of their Promoter Agreement.

ⁱ Live & Local Derbyshire Community Touring Network, Live & Local Staffordshire Community Touring Network, Live & Local Warwickshire Community Touring Network, Shindig Worcestershire Community Touring Network, Centre Stage Leicestershire and Rutland Community Touring Network, Lincolnshire Rural and Community Touring, Village Ventures Nottinghamshire Community Touring Network

ⁱⁱ Big Picture Show Staffordshire Community Cinema Network, Big Picture Show Warwickshire Community Cinema Network