



## GDPR and Privacy Policy

Plunge Boom

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Person Responsible: Mimi Faulks (Production Manager)

### Introduction

Plunge Boom is committed to protecting and respecting your privacy and adheres to all guidance set out by GDPR.

We are a private limited company and we hold personal data for school staff, festival and workshop participants, suppliers and mailing list subscribers. We will only use the information that we collect about you in accordance with the General Data Protection Regulations 2018.

This policy explains why and how we collect information about you, and how we store and use it.

Please note, whilst recognise the importance of GDPR, as an organisation that works primarily with children, if needed, our Safeguarding and Child Protection come first, and we will adhere to these above all other things.

### What is Personal Data?

Personal data is defined to be any information that is relating to an identifiable person who can be directly or indirectly identified. This includes name, address, email, identification number, location data, online identifier or image. The GDPR applies to both automated personal data and to manual filing systems.

### How do we collect Personal Data?

When you contact us, register for a festival project, give us information via our website or sign up to our newsletter, we may retain elements of your personal information.

We sometimes collect personal data for evaluation purposes after your participation in one of our activities.

We do not purchase data on individuals or organisations for unsolicited marketing or any other purpose. Nor do we sell or share any data, except with funding partners, in which case, all data becomes anonymised, unless explicit consent have been given.

In using our website, participating in our festival projects or workshops or contacting us via any other means, you agree that your personal information may be collected, stored and used by us, for any of the following purposes:

- to fulfill contractual agreements in participating in a festival or other project
- to send you details of our other products and services which we think may interest you, unless you opt out as described in “Your Rights” below
- to allow you to use the full range of applicable resources on our website
- to send you news and updates if you consented to this
- to comply with legal and safeguarding requirements (including reporting to partner organisations and local authorities where this is a legal requirement)
- to request your feedback in order to evaluate our work

#### How do we store Personal Data?

All information we collect is stored on our secure server. Paper documentation is stored securely in the office while being processed and is kept for no longer than necessary for the purposes for which it is collected. Access to electronic and paper records is restricted to staff with appropriate need for that information.

Occasionally, third parties acting on our behalf (for example, programme printers) may also process information that we collect about you. We have put in place organisational and technical security measures to prevent the loss or unauthorised access of your personal information.

#### Personal Data of Under-16s

The wellbeing and safeguarding of the children and young people with whom we work is our top priority. Please see our **Safeguarding Policy** for further information on this.

We gain consent from parents/ carers of pupils participating in our projects via their school. This consent covers the collection and use of pupil data for evaluation and for us to store and record their image. However, this is only done with expressed consent.

Quantitive data is requested and processed in anonymised form.

We do not collect the personal data of children or young people who participate in workshops or drama days, unless anonymised and we do not collect personal contact details of children or young people under any circumstances.

We do not knowingly collect or maintain personal information from persons under 16 years of age in person or on our website. We will take immediate and appropriate steps to delete any personal information of persons under 16.

We recognise that children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased and their right to erasure is particularly relevant if consent was given on their behalf when they were a child.

We follow best practice concerning taking images of young people, as recommended by the [NCPCC](#); all images are also recorded securely and only used with explicit consent. Please see our Safeguarding and protection policies for more information concerning this.

### Personal Data of Over-16s

We collect personal data from you only:

- where we have your consent to do so
- where we have a contract in place with your employer and require your information as you are a participant in our work
- where the processing is in our legitimate interests and not overridden by your rights

We will make these reasons clear. Our present data will be retained and reviewed in line with our legal basis for keeping this data.

If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect our rights, property, or safety of our users and others, then we will do so. If you use your credit or debit card to purchase from us, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard [here](#). Any payment transactions will be encrypted.

### How long do we hold data for?

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service or to comply with applicable legal, tax or accounting requirements).

We may retain elements of your personal information to keep you informed of future Plunge Boom projects that we think will be of interest to you. When we have no ongoing legitimate business need to process your personal information, we will delete, archive or anonymise it.

We store audio/visual media for 5 years, after which we will only continue to store or use it if renewed consent is given.

### What are your rights?

You have the following data protection rights:

- You can decide whether or not you wish to receive some or any material from us
- You can object to processing of your personal information or ask us to restrict processing of your personal information
- You can unsubscribe from certain email communications by following the “Unsubscribe” link in the email communication itself
- You can also email Plunge Boom in request to access, correct, delete or update your personal information on our systems. We will answer every email as soon as possible. [admin@plungeboom.com](mailto:admin@plungeboom.com)

- If we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. This includes the withdrawal of consent for us to store or use audio/ visual media of you at any time. Please email Plunge Boom to this end.

If you have any privacy-related questions or unresolved problems, then please email admin@plungeboom.com

We may update or amend this GDPR and Privacy Policy from time to time, to comply with law or to meet our changing business requirements. When we update it we will take appropriate measures to inform you, consistent with the significance of the changes we make, the policy is also available online at <http://www.plungeboom.com/>

*In this policy, references to “we” or “us” are Plunge Boom*