



Privacy Policy Issue 1.1

1. Introduction

The Goring and Streatley Festival (hereafter called "The Gap Festival", "us", "we" or "our") is committed to respecting your privacy and to complying with applicable data protection and privacy laws.

You can visit our website without disclosing any personally identifiable information about yourself (although please note that we may use cookies and collect other nonpersonally identifiable information about your browsing activity – see our Cookie Policy in section 9 below – for detailed information).

If you do submit personal information by ordering tickets or completing a web form registration, for example, you can be assured that we will use your personal information only to support your continuing relationship with The Gap Festival.

We have provided this Privacy Notice to help you understand how we collect, use and protect your information when you visit our website.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.

2. Personal information collected by The Gap Festival

- 1. Who is collecting the data?** The Gap Festival is the organisation collecting personal data and is the designated data controller for the purposes of the General Data Protection Regulations (GDPR). The contact details of The Gap Festival are: Rebecca Russell, C/O Box 1, London Road, Reading RG1 4QW. Email: help@thegapfestival.co.uk. Rebecca Russell is the nominated Data Protection Officer (DPO).
- 2. Why does The Gap Festival collect personal data?** The Gap Festival collects data required for the purpose of selling tickets to its events at the Festival and in connection with other activities related to the Festival. It also collects data in order to contract with sponsors, suppliers and sub contractors and to interact with donors and volunteers.
- 3. What data is collected?** The data collected may comprise: name, postal address, email address, contact telephone number, IP address and source of knowledge of the Festival.
- 4. What is the source of the data collected?** All data processed by The Gap Festival is supplied by you, its customers or its sponsors, volunteers, donors, suppliers, employees, donors or subcontractors or is sourced from publicly available information. The Gap Festival does not acquire personal data from any third parties.
- 5. What processing does The Gap Festival undertake with the personal data collected?** Processing of data is required for us to perform transactions with you, our customers, and also with our sponsors, suppliers, subcontractors, volunteers, donors and employees. This may include: sending you tickets by email; communicating with you by mail, email and telephone (such as sending you amendments to planned arrangements, wet-weather arrangements, etc.); and sending you news, updates and information about future festivals. We strictly limit the number of communications we make and we will never spam you or sell your data to third parties.

We use the data for our internal research into our customer base and we use the IP addresses of customers to undertake analytics on our customer base using third party software (see section 8 below) such as Google Analytics and for digital marketing to customers. This type of analytics and digital marketing utilises automated decision making to enhance the marketing to customers that we undertake and we use only the data you supply and do not source it from any third party. The data used is anonymised and we cannot trace it back to individuals. We also use personal data to contract with sponsors, suppliers and sub-contractors as well as interact with our donors, volunteers and employees

- 6. What is the lawful basis for processing data?** The Gap Festival's lawful bases for processing data comprises:
 - **Contract:** where The Gap Festival is entering into a contract for the sale of tickets, for the sponsorship of an event or a contract for the supply of goods or services with a subcontractor or supplier, the basis for processing personal data is the precontractual arrangements or contractual obligations of The Gap Festival which require such processing;
 - **Legitimate interests:** where The Gap Festival is processing data of employees, friends, donors, volunteers or customers the basis for processing personal data is the legitimate interest of The Gap Festival to pursue the purposes and corporate objectives of The Gap Festival. In relying on



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legitimate interests, The Gap Festival always undertakes a legitimate interest assessment to assess and articulate the balance of The Gap Festival's interests with those of the data subjects;

- *Legal obligation:* where The Gap Festival is required to process data as a result of a legal obligation, the basis for processing the data is to fulfill the obligations The Gap Festival has under law;
- *Consent:* where The Gap Festival is seeking to send news, updates and information to customers, The Gap Festival seeks consent of its customers to do so. Consent can be withdrawn at any time by contacting the DPO (see details in clause 2.1 above).

7. How long will my data be held? The Gap Festival's data retention policy is for the data to be held until it is no longer of use to The Gap Festival.

3. Data Subjects' rights

All persons who disclose their data to The Gap Festival have the following rights:

- *Right to be informed:* This privacy notice contains the information that The Gap Festival is obligated to disclose to you as a result of its processing of your personal data.
- *Right of access:* You have the right to obtain confirmation that your data is being processed and to access your personal data.
- *Right to erasure:* You have the right to request the deletion of your personal data where there is no compelling reason for The Gap Festival to continue processing the data.
- *Right to restrict processing:* You have the right to request the suppression of the processing of personal data, whereby we can continue to store your data but cannot process it.
- *Right to data portability:* You have the right to obtain and reuse your personal data for your own purposes across different services.
- *Right to object:* You have the right to object to the processing of your personal data.
- *Rights related to automated decision-making and profiling:* You have the right to object to profiling and any automated decisionmaking and to access the data used so that you can review and edit for any accuracy issues.

If you wish to exercise any of the above rights please contact our DPO (see details in clause 2.1 above).

4. Right to withdraw consent

You have the right to withdraw consent at any time for the processing of data to receive news, updates and information about future festivals and other activities related to the Festival. Please contact the DPO (see details in clause 2.1 above).

5. Your right to lodge a complaint

You have the right to lodge a complaint at any time with the Information Commissioner's Office (Helpline number: 0303 123 1113 or email via the ICO website: www.ico.org.uk)

6. Legal restrictions

If The Gap Festival believes in good faith it is necessary or when required by the law, The Gap Festival will disclose personal information to:

- Cooperate with the investigations of purported unlawful activities;
- Identify individuals who may be violating the law, a legal notice or the rights of third parties;
- Comply with legal requirements or any legal notice or process served on The Gap Festival; and
- Protect or defend the rights or intellectual or physical property of The Gap Festival, The Gap Festival website or visitors to the website.

7. Security

The Gap Festival takes great care to ensure the security of all data received from customers' personal computers to the servers we use and all stored information on our systems. Access to stored information is password protected. The Gap Festival does not store any credit card or banking details on its website or other information systems. Where sensitive information, like credit card details or financial information is transmitted by the customer, we use Ticket Source to collect payments <https://www.ticketsource.co.uk/kb/terms-of-use/customer-data-privacy-policy>. The Gap Festival ensures that access to data and passwords used to access such data are only known to The Gap Festival personnel and trusted contractors who are authorised by The Gap Festival to access this information.



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8. IP Address

When a customer logs onto our websites, the website records the IP address which denotes the location of the customer's computer on the internet. The IP address does not reveal personal information about the customer but The Gap Festival will use such information in conjunction with other information if required to enforce compliance with our Terms and Conditions or to protect the website, Festival or other customers. The Gap Festival will also use this information to undertake profiling and limited automated decision-making for the purposes of marketing to our customers where consent has been given.

9. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site or by clicking 'accept', you are agreeing to our use of cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive. We collect information through cookies to ensure the content of the website and the website pathways work as effectively as possible. We use the following cookies to help us achieve this:

- *Operational cookies:* These are cookies that are required for the operation of our website and are completely anonymous. Below are examples of when or why we will use these cookies:
 - to help the website to function and enhance the look and feel of the website;
 - to ensure you are always provided with a quick and responsive browsing experience;
 - to help our web servers respond to your actions on the website or browsing the website. The website would not be able to work without it; and
 - they also help to improve navigation around our website and allow you to return to pages you have previously visited.
- *Analytical/performance cookies:* Allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works. Below are examples of when we will use these cookies:
 - statistical information and log data about the number of visits to certain pages on the site;
 - the pages you viewed and activities you carried out during your visit; the time and date of your visit;
 - the duration you stayed on a certain page; and
 - the path taken whilst on the site.
- *Functionality cookies:* These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences. Below are examples of when we will use these cookies:
 - as soon as you visit the website, a cookie on your device will identify you have returned to the website and record your preferences;
 - when submitting a comment to one of our blogs, the information you enter is remembered in order to make it easier for you to comment next time.

By using our website you agree to us placing the cookies specified above on your device (phone, android, computer, mac, etc.).

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

How do I turn cookies off?: If you want to delete cookies that are already on your device you can do this by deleting your browser history or visit www.aboutcookies.org. You can also block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Dated: 06.01.2020