

Oxford Theatre Guild Data Protection Policy

Adopted by OTG Committee, May 2018

This policy governs all use of personal data (as defined by the GDPR) by Oxford Theatre Guild, including directors, production managers and other responsible parties within the context of OTG activities.



Its aims are

- to ensure that personal data processing by OTG is lawful under the GDPR
- to instil a “privacy by default” methodology in OTG processes
- to ensure that all OTG staff and participants are trained and informed about their rights and responsibilities towards personal data processing

Governance, management and training

All new type of processing of personal data not outlined in this document must be approved by the trustees, who will review the reasons for processing and necessary safeguards. The contact point for enquiries about personal data processing by Oxford Theatre Guild is privacy@oxfordtheatreguild.com.

All individuals processing personal data for OTG must be duly nominated as part of this policy or equivalent documentation, and must be trained in appropriate use and safeguards of that data.

Data processing activities

A separate document, “OTG register of data processing activities”, sets out in detail what personal data is used by OTG, and how. It is to be treated as a part of this policy.

Third party processors

All third party processors are required to have GDPR contractual terms in place, and adequate safeguards (eg Privacy Shield) for transfer outside the EEA.

Information security and general processing requirements

Personal data managed by OTG is held on password protected computers and/or online accounts, and only handled by nominated individuals (trustees, or senior production team members) on a need to know basis.

This policy, or other supplementary documents, provide specifications for where data should be stored and accessed. **No personal data should be shared outside official roles (director, production manager, stage manager, committee members) without explicit consent from the individual concerned.**

Social media

It is OTG's policy to not engage with social media systems in such a way that we become a data controller.

For example, we will not use Facebook's data file Custom Audience product or Facebook's measurement and analytics services, or upload a tailored audience to Twitter.

Retention

The data processing activities appendix detailed specific retention periods. In addition, when a postholder resigns (for example a production closes, or a committee member stands down from the committee) they should ensure that personal data they have processed on behalf of OTG is transferred to another committee member, or deleted if the purpose has expired.