

## Privacy Policy

| Issue | Updates (pages) | Date                       | Reviewer     |
|-------|-----------------|----------------------------|--------------|
| 1     |                 | April 2020                 | Emily Bowman |
| 2     |                 | 28 <sup>th</sup> July 2021 | Emily Bowman |
| 3     |                 | 27/07/2022                 | Emily Bowman |
|       |                 |                            |              |

The Mighty Creatives are committed to preserving your privacy. This policy explains how we use and protect any personal information that we collect about you.

By visiting our website ([www.themightycreatives.com](http://www.themightycreatives.com)), making a purchase or donation, or registering your details with us for any reason, you are accepting and consenting to the practices described in this policy.

### **How we collect information about you**

This section outlines how we may collect, process and store information about you.

### **Information you give us**

You may give us information about yourself by filling in a form on our website or by corresponding with us by phone, email, post or otherwise.

This includes information you provide when you register for our email lists, subscribe to our membership schemes, enter a competition, make a donation or register your interest in one of our training workshops, programmes or events. It also includes information you provide when making a purchase on our website [www.themightycreatives.com](http://www.themightycreatives.com).

We may also collect information from you through surveys or sign-up forms on third party websites [surveymonkey.com](http://surveymonkey.com) and [mailchimp.com](http://mailchimp.com).

The Mighty Creatives does not control the information you provide to our partners when booking tickets for our touring performances and events.

### **Information we collect**

We may collect information about your interests to help us inform the service we offer to you.

We may sometimes collect photography or video footage of individuals involved in our courses, programmes and projects. Where this involves large groups, you will be notified of this happening and given the opportunity not to be included. Where the filming or photography involves small groups or individuals, we will seek your consent to use these. You can withdraw consent at any time by contacting [info@themightycreatives.com](mailto:info@themightycreatives.com). Once consent is withdrawn, we will not use the relevant images or footage again, but it will not normally be possible to recall documents or marketing materials in which the image has already appeared.

With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform

- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page and any phone number used to call our office number.

### **Information we receive from other sources**

You may agree to give us information about yourself through third parties such as our partner venues, advertising partners or cultural networks. You will always have given permission before your personal data is shared with us.

We also collect information from public sources, and we may receive anonymised statistical information about our audiences from our partners and cultural networks.

### **Cookies**

Cookies are small amounts of information which we may store on your computer when you visit our websites.

Our websites use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie policy.

### **Sensitive personal data**

We may collect sensitive personal information about you including information about your racial or ethnic origin, your religious or other beliefs, trade union memberships you are a part of and offences or alleged offences committed by you. Such Sensitive Personal Data shall only be collected after having obtained your explicit consent to do so or where it is necessary to do so to comply with legal requirements including for employment law purposes.

Some sensitive data is requested in our customer surveys but is analysed anonymously and is not obligatory to provide.

### **How will we use your information**

- To carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request from us.
- To ensure the safe running of our operations. For example, we may store health information about participants on our courses or programmes to enable us to take adequate safeguarding measures and respond appropriately in an emergency situation.

- If you consent, we might also use your information to let you know about our news, products and services which may be of interest to you. If you change your mind about being contacted by us, you will be able to unsubscribe from our email list or update your contact preferences at any time by contacting the sender or clicking the unsubscribe link on our marketing emails. You can also unsubscribe or challenge the use of your information by emailing us at [info@themightycreatives.com](mailto:info@themightycreatives.com)
- To notify you about changes to our service.
- To analyse your information and carry out segmentation. This is used to better understand customer behaviour and, where your consent is given, to inform you of the productions and services we believe are of most interest to you. If you do not wish us to use your data in this way, please email [info@themightycreatives.com](mailto:info@themightycreatives.com) and we will stop the behavioural segmentation of your data.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To send you market research surveys to help us better understand our audiences.
- To conduct research and fundraising activities to promote the interests of the The Mighty Creatives as a charity (see the Fundraising section of this policy).
- To administer membership records, supporters' records and giving schemes.
- To report on our audiences and activities to funding bodies, specifically Arts Council England and principal funders.

### **Disclosure of information**

We may share information about you with third-party organisations for the following reasons:

- In order to provide our products and services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These may include, for example, payment processing organisations, delivery organisations, fraud prevention and screening and credit risk management companies, and mailing houses.
- If you consent to receiving marketing emails from us, we will use a third-party website called [mailchimp.com](https://mailchimp.com) to store your subscription data. We will use [mailchimp.com](https://mailchimp.com) as service provider to send our marketing emails to you.
- We may share your data with advertising networks and/or social media platforms

for the purposes of selecting and serving relevant adverts to you via those networks/platforms

- We may share information about your behaviour on our website with search engines and analytics providers.
- We may share your data with third parties if we are under a legal or regulatory duty to do so.
- We will not share your Sensitive Personal Data with third parties without your consent.
- We do not sell your personal information to third parties for marketing purposes without your consent.

### **Security and data retention**

We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

We will retain your information for a period of 5 years or as long as the law requires. We may also keep some information about you indefinitely for archiving purposes, if you give us permission to do so.

### **Young People**

If you are under the age of 18 you must seek permission from your parent or carer before registering any personal information with The Mighty Creatives.

We may collect personal information about individuals under 18 who take part in our courses, programmes and events, for the purpose of running these activities.

We may also collect personal information such as imagery and testimonials for the purpose of promoting our programmes and projects. In this instance we will always ask for consent to use this information from the individual (if they are 18 or over) or their parent or carer (if they are under 18).

We always treat people under the age of 18 in line with our Safeguarding Policy.

### **Fundraising**

Like most charitable organisations operating in the arts and cultural sector, The Mighty Creatives needs to raise funds beyond our commercial and core funding revenue streams to survive. This can be through donations from individuals, companies or trusts and foundations. We do this by adhering to the same practice of privacy applied across all the charities traded activities.

To ensure our contact with individuals, companies and trusts and foundations is in line with our interests as an organisation, we conduct surface level research and analysis. We do this by using customer data submitted by individuals to our organisation, such as donations or memberships, in addition to data gathered from public sources such as Companies House, Charities Commission and LinkedIn. For example, if an individual has donated to The Mighty Creatives recently, we may consider contacting them regarding forthcoming campaigns we believe they may be interested in, according to their demonstrated interests. This would also be the case if you have indicated an interest in supporting our fundraising activity in your email preferences.

By using legitimate, public resources, we can build an accurate profile of current and prospective donors, giving them greater opportunities to access our work but also streamline our communications to each of our audiences.

We use personal data, when necessary, to inform an individual as to the status of a donation or membership, such as when we send a Direct Debit instruction to an individual who has signed up or renewed as a Member via that payment method. Similarly, we will contact you if there are any changes to benefits associated with such schemes or if an interest has been expressed by an individual to modify their current benefits.

When collecting data, we track our actions and record them, ensuring that what we collect is open to scrutiny, both internally and externally. As such, if you wish to request further information on the data collected in relation to yourself or your organisation, or if you are not happy to be profiled in any way and wish to opt out from our database, please contact us.

### **Access to the personal information we may hold about you**

You can ask us whether we are keeping personal data about you and request a readable copy of any personal data which we keep about you, by sending an email to [info@themightycreatives.com](mailto:info@themightycreatives.com).

Although we may require you to provide proof of your identity in advance, we will aim to respond to your request within 28 days and will do so free of charge. We reserve the right to charge an administrative fee when a request is manifestly unfounded or excessive.

You have the right to ask us not to process your personal data for marketing and/or fundraising purposes or to update your preferences on how we can process your data at any time. You can do this using the contact details below.

### **Changes to the privacy policy**

This privacy policy was last updated in March 2020. Any changes to our privacy policy in the future will be posted to our website and, where appropriate, through email notification.

### **Contact**

If you have any questions, comments or requests regarding this privacy policy or what we do with your data, please email us at [info@themightycreatives.com](mailto:info@themightycreatives.com) or write to us:

The Data Protection Officer  
The Mighty Creatives  
LCB Depot  
31 Rutland Street  
Leicester  
LE1 1RE

Further guidance on your privacy rights and how to lodge a complaint with a supervisory authority is available from the ICO.