

# **Privacy Policy**

#### 1. About this privacy notice

Opera21 is committed to keeping your personal data safe, and to be transparent about how we will use it. This privacy notice tells you what we will do with your personal information when you engage with us.

This notice was last updated on 20<sup>th</sup> July 2021.

#### 2. Who we are

Founded in 2021 by director-librettist Max Hoehn, Opera21's mission is to commission a series of new operas-in-progress and showcase them online through an exciting offering of musical extracts, downloadable libretti and behind-the-scenes interviews.

#### 3. How do we get information?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You are a participant or performer in our commissions, workshops or recordings.
- You help fund our activities as an individual or as part of an organisation
- You visit our website
- You engage with us via our social media channels
- You have subscribed to our email bulletins and other communications
- You engage with our organisation as a professional or a business



# 4. Your data protection rights

Under data protection law, you have rights that we need to make you aware of. The rights available to you depend on our reason for processing your information.

# 4.1. Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. You can read more about this right at <u>https://ico.org.uk/your-data-matters/your-right-of-access</u>.

# 4.2. Your right to rectification

You have the right to ask us to rectify information that you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can read more about this right at <u>https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected</u>.

#### 4.3. Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. You can read more about this right at <u>https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted</u>.

#### 4.4. Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this right at <u>https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data</u>.

#### 4.5 Your right to object to processing

You have the right to object to processing if we are able to process your information because the process is in our legitimate interests. You can read more about this right at <u>https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data</u>.



#### 4.6. Your right to data portability

You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. You can read more about this right at <u>https://ico.org.uk/your-data-matters/your-right-to-data-portability</u>.

We will respond to any data processing request in a timely manner. Please contact us by email or over the post if you wish to make a request.

# 5. Sharing your information

We will not share your information with any third parties for the purposes of direct marketing.

If you are a participant or performer in one of our workshops, performances or other activities, we may share your personal data, not including special category data, with organisations with whom we partner to deliver our services.

We use data processors who are third parties who provide elements of services for us, for example, our email and website hosting providers. They cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally required to share information. For example, under a court order. In that case, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision-making.

# 6. Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.



# 7. Your right to complain

Opera21 will do everything within its reach to ensure your personal data is safe. If you have queries or concerns, please contact us at <u>contact@opera-21.org</u> and we'll respond. If you remain dissatisfied, you can make a complaint about the way we process your personal information to the Information Commissioner's Office at <u>https://ico.org.uk/make-a-complaint</u>.

# 8. The data that we collect when you communicate with us

#### 8.1. Social media

Opera21 operates accounts on Facebook, YouTube and Instagram. You can read more about how these services handle personal information at:

- <u>https://www.facebook.com/full\_data\_use\_policy</u>
- https://help.instagram.com/155833707900388
- <u>https://www.youtube.com/static?template=privacy\_guidelines</u>

Authorised Opera21 staff have access to certain personal data of people that engage with us on these social media sites, through a link to their personal profiles. How much personal data is visible in these personal profiles will depend on the nature of the social media site itself and on the privacy settings that the person has selected.

Opera21 staff will never collect any personal information from these personal profiles, nor will it allow unauthorised staff to have access to these personal profiles through Opera21 accounts.

Authorised Opera21 staff might choose to respond to private messages received via these social media sites, and for safeguarding purposes might choose to keep records of any private communication through these sites. The content of these messages will not be shared with third parties, except when Opera21 is required by law to do so.



Opera21 staff have access to insights and analytics from the social media sites that it engages with. This is anonymised data that will allow the company to measure engagement and social media campaign results, and to identify trends.

#### 8.2. Emailing us

Emails sent to or from <u>contact@opera-21.org</u> accounts are stored on web servers associated with our webmail account.

Opera21 does not use its email server to send mass emails, but during its email interactions with individuals, Opera21 staff might give them the opportunity to sign up to further electronic communications by signposting them to the relevant subscription links.

# 8.3. Visitors to our website

Opera21 operates the websites: <u>www.opera-21.org.</u> The website is designed in WordPress using the Elementor plugin. You can read about WordPress at <u>https://en-gb.wordpress.org/about/privacy/</u> and about Elementor at <u>https://elementor.com/privacy-policy/</u>.

The website uses cookies to optimise the experience of users. According to the Information Commissioner's Office, 'a cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.' You can read about cookies at <a href="https://ico.org.uk/for-the-public/online/cookies">https://ico.org.uk/for-the-public/online/cookies</a>.

The website uses a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. This allows us to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make any attempt to find out the identities of those visiting our website.

#### 8.4. Making a donation

If you make a donation to Opera21 via a third party (for example, Enthuse or crowdfunder.co.uk) we will be sent details of the amount you have donated and



your contact information. We will save the information to keep a record of your donation and to contact you regarding the donation if we need to. We may write to you at the postal address you provide to thank you for your donation and to ask you whether you would like to hear from us by email. If you tell us not to contact you further, we will not.

If you make a donation directly to Opera21 and provide your contact details, they will be processed in the same way as above.

#### 9. How we use your data

As a general rule, we will only collect as much personal data as is strictly necessary to carry out our activities. We will store it securely, ensure that it is only accessed by authorised Opera21 staff, and we will not share it with any unauthorised third parties.

We will only hold your personal data for as long as it is strictly necessary to carry out our activities, or as long as we are required to do so by law. We will regularly review the personal data that we hold to ensure that it is still relevant and necessary.

# 9.1. *If you are a participant or performer in one of our workshops, performances or other activities*:

We will collect personal and contact information that will allow us to stay in touch with you, as well as some demographic information that we will anonymise to report back to our funders.

We collect feedback from you about our activities and their impact on you, in terms of social inclusion and wellbeing. We will anonymise this data and use it to report back to our funders.

During and after workshops, performances and other activities, we will collect data for attendance, participation and incident reports. These will be stored securely and accessed by authorised Opera21 staff, to help them deliver the best possible experience for our participants and performers, and reporting about activities. This



data may be shared with organisations with whom we partner to deliver our services.

Additionally, with your consent, we will produce, store and publicly use photos and videos in which you may be recognisable. We will use these to document and promote the work of Opera21 and the achievements of its performers.

We will only use the above information when you have consented for us to do so, and you may withdraw your consent at any time by getting in touch with us by email or post. We will regularly review the personal data we possess, to ensure that it is still required. If not, we will delete it.

# 9.2. If you have booked for or attended one of our performances:

If you booked tickets through a venue where we performed, that venue might provide some personal data if you consented for them to share it with third parties.

If you booked online through a service such as Eventbrite, we will receive some contact information. You can read Eventbrite's privacy notice at <a href="https://www.eventbrite.co.uk/support/articles/en\_US/Troubleshooting/eventbrite-privacy-policy">https://www.eventbrite.co.uk/support/articles/en\_US/Troubleshooting/eventbrite-privacy-policy</a>.

We will only use the above information when you have consented for us to do so, and you may withdraw your consent at any time by getting in touch with us by email or post. We will regularly review the personal data we possess, to ensure that it is still required. If not, we will delete it.

#### 9.3. If you have applied or have taken part other initiatives we organise:

We will collect personal information that will allow us to be in touch with you, as well as information that will enable our panel to evaluate your application.

We will only use the above information when you have consented for us to do so or, if your application has been successful, when we are engaged in a contract with you. We will regularly review the personal data we possess, to ensure that it is still required. If not, we will delete it.

9.4. If you help fund our activities as an individual or as part of an organisation:



We will collect some personal data that will allow us to contact you regarding your donation, and we will store financial records as required by law. You will only receive our e-bulletins and other marketing emails if you actively subscribe to them.

We will process your personal data either because we have your consent to do so, because we are engaged in a contractual relationship, or because we have a genuine and legitimate reason to do so, and we are not harming any of your rights and interests.

# 9.5. If you have subscribed to our email bulletins and other marketing emails:

We may hold your full name, email address and post code.

We use MailChimp to produce and distribute electronic newsletters and other mass emails. You can read about how MailChimp manages personal data at <u>https://mailchimp.com/legal/privacy/</u>.

We will manually subscribe people to our electronic communications only when we have written proof that they have consented to receive these communications, and we will ensure that they are only added to specific lists connected to the type of information that they have consented to receive.

Every email that we send through MailChimp will include an unsubscribe link, as well as a link that will allow people to edit the personal information that we hold.

When a person chooses to unsubscribe from Opera21 emails, their email address is deleted from the email database and it is added to a private Unsubscribed list on the MailChimp servers. Once an email address is on this list, it cannot be added again to the email database and no additional emails will be sent to that email address.

# 9.6. If you engage with Opera21 as a professional or a business:

We may hold some personal information required to conduct our activities. We will store this information in our office servers or our email servers, and we will no share it with any unauthorised third parties.

We will process your personal data because we have a genuine and legitimate reason to do so, and ensure we are not harming any of your rights and interests.



For any enquiries regarding this policy, please contact Max Hoehn at <u>contact@opera-21.org</u>