1. Introduction

1.1 In order to stage the Festival, and manage its affairs effectively, Cheltenham Festival of Performing Arts (CFPA) needs to collect and use certain personal data about individuals such as: competitors, their parents or teachers, CFPA Members and Friends, volunteers, adjudicators, sponsors, etc. This Policy states that personal data must be protected from unlawful disclosure and describes how it may be used and handled to meet CFPA's data protection standards – and to comply with the law.

2. Purpose of the Policy

2.1 The purpose of the Policy is to ensure that CFPA:

- complies with data protection law and follows good practice
- protects the rights of all individuals whose personal data is collected and held by CFPA
- is open about how it handles and uses individuals' personal data
- protects itself from the potential reputational and financial risks of a data breach

3. Scope of the Policy

3.1 This Policy applies to; the trustees of CFPA, all volunteers of CFPA, as well as contractors, suppliers and other people working on behalf of CFPA.

3.2 This Policy applies to all personal data that CFPA holds, which can include:

- names of individuals
- addresses, including email addresses
- telephone numbers
- other information relating to individuals, such as: date of birth, gender, school attended, bank account details, etc.

4. Data Protection Law

4.1 The General Data Protection Regulation (GDPR) updates the previous position on data protection law contained in the Data Protection Act 1998. The GDPR specifies how organisations must collect, handle and store personal information. The rules apply regardless of whether data is stored electronically, or in any other way. To comply with the law, personal data must be collected and used fairly, stored securely, and not disclosed unlawfully.

4.2 It is the policy of CFPA to collect and process all data legally under GDPR and to ensure that all entry and application forms clearly inform individuals that, by signing such forms, they are consenting to their personal data being collected and processed by CFPA in accordance with this Policy.

5. CFPA's Use of Personal Data

5.1 CFPA uses personal data to stage the Cheltenham Festival of Performing Arts effectively and efficiently for the educational and artistic benefit of the Festival performers and the community. For instance, CFPA uses the personal data of competitors from year to year to invite them (via their parents, guardians, or teachers, if appropriate) to take part in future events; CFPA maintains the personal data of Friends, Members, and volunteers, to keep them informed about CFPA's meetings and forthcoming events; CFPA also maintains records of adjudicators, sponsors and suppliers, so that it can manage its commercial and financial interests effectively over time. No personal data, other than that wholly necessary to enable CFPA to fulfil its constitutional purpose, shall be held by CFPA.

5.2 The personal data held and used by CFPA must only be collected with the express consent of the individual (or parent/guardian or teacher, where the individual is a child). The only personal data published in the Festival programme and shown on CFPA's website are the contact details of its officers and the names of Festival performers.

5.3 Personal data will be held securely and, except in those circumstances set out in 5.4 and 5.5, only disclosed to a third party (i.e. any person not directly involved in running CFPA) with the prior written consent of the individual concerned (or his/her parent, guardian, or teacher, where the individual is a child).

Note: CFPA's subcontractors and suppliers will be required to provide assurances that they are bound by the same conditions as CFPA in connection with personal data to which they may have access when carrying out work for CFPA.

5.4 As indicated on CFPA's recruitment documents and application forms, the personal data of trustees and committee members, other volunteers and stewards, CFPA Friends and Members, will be disclosed to any public authority or law enforcement agency (if they ask for it) to comply with law or regulation, or for possible legal proceedings.

5.5 As indicated on all Festival entry forms, CFPA may disclose the personal data of Festival competitors to public authorities, for instance, in connection with Child Licensing legislation.

5.6 Personal data will be held only as long as CFPA needs it and this will depend on the type of information and the use to which it may be put. Personal data may be held for a number of years so that CFPA can, for example; publicise the Festival, communicate with previous competitors, and manage suppliers' services,

5.7 It is the responsibility of CFPA's trustees to ensure that personal data that is of no further use to CFPA is promptly destroyed, either by the deletion of computer entries and/or by destroying paper copies.

6. The Rights of Individuals

6.1 Any individual, whose personal data is held by CFPA, has the right to make a 'Subject Access Request' in order to find out what information about them is being held by CFPA. Such a request must be made in writing to the Honorary Secretary (see contact details on CFPA's website). CFPA undertakes to respond within 30 days of receiving the request.

6.2 Any individual has the right to ask CFPA to update his/her personal data if it is inaccurate or incomplete.

6.3 Unless circumstances exist where CFPA is legally entitled to retain an individual's personal data, any individual has the right to demand that CFPA erases his/her data.

6.4 Any individual has the right to make a complaint to the Information Commissioner if he/she thinks that any of his/her rights have been infringed by CFPA.

7. Breach of Data Security

7.1 If anyone associated with CFPA believes that a breach of privacy has occurred in connection with any personal data held by CFPA, he/she should immediately notify any of CFPA's trustees and provide details of the suspected breach. The trustees will investigate and take steps to (a) minimise any difficulty caused by the breach and (b) consider the introduction of

any measure that might prevent a future breach, including any addition or amendment to this policy.