### **Cinema City Limited Privacy Policy**

This policy explains when and why we collect personal information about you, how this information is used, the conditions under which it may be disclosed to others, and how it is kept secure by us.

This policy may change from time to time so please check this page occasionally to ensure that you're happy with any changes.

#### Who we are

Cinema City Limited is a data controller and processor in relation to the processing activities described below on behalf of Cinema City Limited and Cinema City Education.

This means that we have responsibility for how your personal information is processed by us.

### How we collect data

When you interact with us online, or by phone, email, person or otherwise, you may be providing us with personal data. We always seek to minimise the information we ask for to just that which is needed to perform the activity or service that we are delivering. In limited circumstances particularly if you are working with us on a project we may also ask you to provide more information like your National Insurance number or passport information.

When we are talking about personal data we mean information that may include your name, profession or working role, your address, email address and phone number. Sometimes when we are conducting projects for other agencies and funders we may also ask you to volunteer information around gender and ethnicity or other personal information for the purpose of evaluating the successes and reach of the project. This sensitive personal information (now called 'special category data') will only ever be sought by us from you on a voluntary basis.

## How we use your data

The purposes for which we seek and use your information and the legal basis under data protection laws on which we rely to do this are listed and explained further below

- to comply with legal and tax obligations
- to fulfill our contractual obligations to you or a third party
- to communicate with you on subjects and activities where you have identified an interest in being kept informed or up to date

Your personal information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this aggregated data for analytical and research purposes and to respond to questions raised with us by funders such as Norfolk County Council, the Heritage Lottery Fund, the BFI or other publicly funded bodies or agencies. Sometimes we may be asked to share our aggregated data with partners so that they can get a picture of the activity in the creativity community that we work with in our region.

We will not sell your personal data or allow it to be used for commercial purposes.

### Retention and security of data

We will delete special category data promptly, subject to meeting our legal tax and contractual obligations.

Your personal data will not be shared outside the UK unless our data storage provider uses servers outside the UK in countries which have similar data protection laws to the UK.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service to us and we have a contract in place that requires them to keep your information secure in compliance with this policy and not to use it other than in accordance with our specific instructions.

We keep personal information for as long as necessary to ensure we can deliver our services and meet our legal and contractual obligations.

# Your rights

You have a number of rights in relation to your personal information under data protection law including the right to see the data that we hold about you. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable to help us to search for your personal information.

Except in rare cases where additional time may be required, we will respond to you within one month from either (i) the date that we have confirmed your identity, or (ii) where we do not need to do this because we already have this information, from the date we received your request

Where we rely on your consent as the legal basis for processing your personal information, as set out above, you may withdraw your consent at any time by contacting us at info@cinemacityeducation.org.uk.