KIRKGATE PRIVACY STATEMENT FOR WEBSITE

OCTOBER 2021

Your privacy is important and you have the right to know how we use your personal information. This policy covers how we collect, use, store and protect your personal information.

**Covid-19 Test and Trace: Data Protection notice**

Following current Government guidance, we may need to collect your contact details to support health authorities in tracing guests if someone subsequently tests positive for Covid-19.

Posters with the QR codes for checking in are available but there is no legal requirement to collect details for Test and Trace purposes. It is not mandatory to provide this information. The processing of your personal data is in accordance with the General Data Protection Regulation Article 6(1)(f) (processing is necessary for our legitimate interest in assisting public health authorities in relation to the coronavirus public health epidemic).

Where we do hold this information, Government guidance requires that contact details obtained for testing and tracing purposes are held for 21 days.  When collected online we hold the same information for our own operational purposes.

How do we use your personal information?

We use your personal information to:

Provide you with any services and products you order from us

Tailor your online experience to you (if you are logged in)

Tailor your marketing communications

Connect with you on social media

Get your feedback

Carry out business analytics and to develop our products and services

Monitor for fraudulent or suspicious activity.

It is important that the personal information which we hold about you is up to date. Please keep us informed if your personal information changes.

**Social Media comments and feedback**

When you contact us on social media, we use your information to respond, and keep a record of this. This may include information about your identity, or any other relevant personal information that is visible from your social media post and/or public profile.

We may also use this information in a statistical and anonymised format to identify trends and improve your experience using our services.

We may contact you directly via social media platforms if we’d like to share your comments or pictures with other guests or publish them on our marketing channels. We will always ask you for your permission to use your post.

**Complaints and incidents**

When there is a complaint, incident or query we use your personal information to contact you, record and investigate the incident.  We also report on and analyse complaints and incidents to improve the experience that we provide and for the administration of any subsequent legal claims.

If we collect your sensitive personal information, we process this on the basis of legal obligation.  This is so that we can comply with our health and safety/reasonable adjustments obligations.

In a medical emergency if personal information needs to be shared to protect you (or someone else) we process your information on the basis of essential need.

**Competitions**

We use your information to select and inform competition winners.  Where you actively enter into one of our competitions, we rely on your consent as the lawful basis for processing.  We collect this data in order to tailor your experience and fulfil the terms of the competition.

**Market research**

We use your information to understand trends and monitor and improve our services. We may contact you by email to ask you to participate in a survey. Participation in surveys is completely voluntary and you can complete the online survey anonymously.

**Sensitive Personal Information**

We only process sensitive personal information about you with your explicit consent, or to comply with legal obligations such as for health and safety purposes for example for

* Wheelchair accessible ticket booking.
* Food allergy information for our hosted events
* Complaints or queries where you provide health, medical or disability information relevant to your complaint or query.
* Accident or incident reports.

We collect and keep this data for the legitimate interest of tailoring your experience.

**Direct Marketing / Newsletter Subscribers**

For those that have signed up to our database or ordered tickets from us we send out bi-monthly ‘What’s On’ bulletins and monthly editions of the online Kirkgate Quarter Chronicle. We keep you informed of what is happening, events, offers, competitions and news. You can opt out of these email notifications any time by emailing us at the address notified on the website.

We require your email address in order to subscribe you to these communications. We also ask you to provide additional personal information to enhance the way we communicate with you but if you do not provide it, you will be treated in the same way as if you had provided it. The additional information that would be helpful is

* Your first and last name so that we can communicate with you personally
* Your full address so that we can tailor your experience

To provide you with relevant content and improve your experience, we may use your purchase history, watchlist and location.

We require your consent to collect this data.

**Ticket Bookings**

If you purchased tickets via the website (or through our fulfilment partner Ticketsolve) we, in conjunction with our ticket fulfilment partner, collect some personal data from you in order to complete your transaction. We don’t ask for more data than we need in order to fulfil your order. The minimum personal data required includes:

* Your email address
* Your address : in order to process your order and deliver your tickets if applicable

Your payment details (never stored, only passed securely to the relevant payment provider to authorise payment)

We use your information to manage your order.  We may contact you by email or phone with information about your order, such as cancellations.  This is necessary for the performance of the contract.

The legal basis for us collecting, processing and storing this data is the legal contract for sale that we enter into with you.

**General Website Users/Cookies**

This applies to anyone that visits our websites. As a general website user we clearly don’t directly collect any information from you, but in order for us to deliver our services we collect some indirect information as part of our legitimate interest in running our business.

We use information collected using cookies to help us analyse, develop, manage, provide and market our goods, services and communications.  Our [Cookies Policy](https://beta.odeon.co.uk/privacy-and-legal/cookie-policy/) contains more information on how you can control the cookie settings on your device.

**Your personal information rights**

You have the right to do the following in relation to your personal information:

* Access the personal information we hold about you
* Request the correction of inaccurate personal information we hold about you
* Request that we delete your personal information, or stop processing it or collecting it, in some circumstances
* Restrict the way that we process your personal information
* Transfer your personal information to another organisation
* Object to us processing personal information based on our legitimate interests
* Object to us processing your personal information for direct marketing purposes.

**Sharing personal information with third parties**

We do not share your contact details with third party companies for direct marketing purposes. From time to time, we may share statistical information about you with business partners and sponsors to analyse, develop, manage and market our goods and services. Your identity will never be revealed.

**Security of Information**

We use security measures to protect your personal information.  These measures include physical and administrative and technical safeguards such as access controls to help protect your personal information.

We look at ways to identify and mitigate potential privacy and security risks. We monitor and test our systems to help protect your information.

Our employees and volunteers are provided with access to your personal information on a 'need to know’ basis.

**Length of Time**

We only keep personal information for as long as is necessary for the purpose for which it was collected (including for the purposes of satisfying any legal, accounting, or reporting requirements).

Full purchase information (including your contact information) is normally held for six years after the purchase date for tax and legal purposes.  We do need to keep some anonymous information for longer than this, such as purchase statistics, so we can analyse it to identify trends and changes in activity.

At the end of the retention period, your personal information is either deleted or anonymised.  Where the data is anonymised it is used for statistical analysis, business planning and product and services development.

**Third-Party Websites**

Our website contains links to third-party websites, for example [Ticketsolve](https://www.opentable.com/legal/privacy-policy) for ticket sales. We are not responsible for the privacy practices or the content of third-party sites.  Please read the privacy policy of any website you visit.

**Queries and Complaints**

If you have any queries concerning your personal information, or this privacy statement, you can contact us at the email on the website.

You can make a complaint at any time, to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk/)).