



Privacy Policy

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1/ General Information

Mwldan is a social enterprise, a charity registered in England and Wales (number 1024034), and a company limited by guarantee.

We are the data controller of the information you provide us with. The term “data controller” is a legal phrase used to describe the person or entity that controls the way information is used and processed.

This privacy notice applies to anyone who uses one of our services, such as purchasing tickets (whether for events or activities taking place in Mwldan or in other locations) or membership, making a donation, using our website, creating an account or subscribing to our email and postal marketing lists but it can also be collected from other sources, including third parties that you have authorised to pass on your information to us, or from data in the public domain.

The following complies with General Data Protection Regulation 2016 (GDPR), and the Privacy and Electronic Communications Regulations, 2003 (PECR).

2/ What personal information do we hold about you?

To conduct and manage our business we collect, retain and use personal information and Special Category Data. This may relate to employees, suppliers, volunteers, trustees and customers.

We only collect, process, and maintain the minimum necessary to provide our services effectively.

While you are not obliged to provide any personal information to us, in some cases we may not be able to provide services to you unless you provide certain minimum information.

Personal information is information that relates to you and includes:

- Name, title, gender, date of birth.

- Contact details including postal address, email address, and telephone number.
- Payment card details (please note, we will not hold payment information for any longer than it takes to process your transaction).
- Purchase history.
- Records of donations and Gift Aid status, where applicable (as required by HMRC).
- Where you have left us a gift in your Will, any information regarding next of kin with which you may have provided us to administer this.
- Any correspondence from you or sent by us to you.

We may collect information to help us improve the effectiveness of our communications with you. This includes tracking whether the emails we send are opened and which links are clicked within a message, and tracking interactions with our website and/or social media adverts (via cookies).

We may collect Special Category Data for the purposes of better understanding our audience members, participants and supporters. This is to help identify ways to improve our communication and maintain our commitment to equality, diversity and inclusion. We use the above term to mean information about your race, ethnic origin, political opinions, religious beliefs, health, or sexual orientation.

Security of your personal information

We take every precaution to protect your personal information.

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible.

We will ensure that any third parties we use for processing your personal information do the same.

We do not routinely transfer any of your personal data outside the EU. Any transfers that do occur will be done in line with the GDPR.

3/ What will we use your personal information for and what are our legal bases for doing so?

We use the personal information we hold about you for different purposes, which we list below. Under data protection law we need to have a valid legal basis for using your personal information, we also set out below the legal bases which we will be relying upon. This may relate to employees, suppliers, volunteers, trustees and customers.

3.1 Contract

One of the most common occasions when we might process your personal information is when we need to do so to fulfil a contract. If you purchase tickets through our Box Office system, for example, we will process personal information including your name, address, email address, phone number and credit/debit card details. To fulfil our contract, we may also send you order confirmations and pre-show information by email or post, or we might telephone you about your order.

To process a transaction your personal information including card details may be passed to third party service providers who act as Data Processors under instruction from us.

We may also collect personal information that you give to us about other people if you register them to attend an event. Please ensure you have notified the other individual(s) and made them aware of this privacy notice.

3.2 Consent

You can opt in to receive specific direct marketing communications from us. For example, we may approach you with requests for financial or other forms of support to help us achieve our mission.

You can also opt in to being contacted directly by specific visiting companies. When you opt into this you agree to your personal information being shared with a third-party data controller (see Section 5 below).

You can withdraw consent at any time by logging into your Customer Account and updating your Data Preferences, clicking unsubscribe on a direct marketing email or by contacting us verbally or in writing via boxoffice@mwldan.co.uk

3.3 Legitimate Interest

Legitimate Interests means that we can process your personal information if we have a genuine and legitimate reason, and we are not harming any of your rights and interests.

Generally, this means that when you provide personal information, unless stated otherwise, we will use this information for our legitimate interests to carry out our business of operating a theatre and arts organisation.

Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

These are what we consider to be core 'Legitimate Interests', with some examples of the types of processes we might use to achieve them.

- **Electronic Direct Marketing:** We may send you information about events, activities and membership/loyalty schemes via email or electronic messenger services which we feel may be of interest to you.
- **Direct Marketing via post:** We may send you postal marketing with information about events, activities and membership/loyalty schemes which we feel might be of interest to you.
- **Promotions:** administering promotional activities including competitions.
- **Profiling:** We may make use of profiling and screening methods to identify potential new customers and supporters, produce more relevant communications, target digital advertising, and provide a better experience for our customers and supporters. Processing your personal

information for profiling can help us target our resources more effectively by gaining an insight into the background of our customers and supporters, helping us to build relationships that are appropriate to your interests and capacity to engage and/or donate.

To do this, we may use third-party Data Processors. We may also use additional sources of data to increase and enhance the information we hold about you.

This may include (but is not limited to) obtaining details of changes of address, date of birth, telephone numbers and other contact details, information related to your wealth, and demographic data generated through geo-demographic tools, such as Audience Finder, survey results and psychographic data. It may also include information from public registers and other publicly available sources such as Companies House, newspapers and magazines.

- **Your Best Interest:** Processing your personal information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.
- **Personalisation:** Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of existing, lapsed or potential customers or supporters.
- **Analytics:** To process your personal information for the purposes of customer analysis, assessment, profiling and segmentation and direct marketing (including targeted digital display adverts), on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information.
- **Research:** To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.
- **Documentation:** We may use photographs, film/videography, sound recording, quotations, feedback and survey responses to document our activities for promotional purposes and for journalistic, academic, artistic and literary functions.
- **Administration** of your Customer Account, in order to ensure your personal information is accurate and up to date we may contact you to update our records. From time to time we will also need to send you our website, notice

and service announcement updates; for HR purposes, such as the collection and storage of CVs and applications; Health & Safety, such as recording accidents

- **Customer Care** – responding to customer feedback.
- **Data Protection:** We will also hold information about you so that we can acknowledge your relationship with us and respect your preferences for being contacted by us.

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under relevant legislation.

Our legitimate business interests do not automatically override your interests – we will not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to do so by law). For more information on your rights see Section 7.

3.4 Legal Obligation

Mwldan retains records of all its financial transactions with you to comply with its legal obligations to maintain adequate accounting records. We may use (and disclose) the information it holds about you to comply with any investigative demand, court order, or a request for cooperation from a law enforcement or other government agency.

We are also legally required to carry out due diligence checks on individuals who give us large donations, to comply with our duties in respect of anti-money laundering legislation and the prevention of fraud.

If you wish to object to the processing of personal information in any of the ways listed above or have questions about this, please contact us via boxoffice@mwldan.co.uk

4/For how long do we keep your personal information?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we need it for the purposes we acquired it in the first place.

When the retention period is reached, we may review whether we still need to retain it or update it. When we consider that the personal information is no longer needed for any purpose it will be securely deleted.

If you request to receive no further contact from us, we may keep some basic information so that we can confirm that the relationship existed – and that it has ended – as well as some of its details. This is to avoid sending you unwanted materials in the future. This information may then be deleted in accordance with the appropriate retention notice.

5/ With whom do we share your personal details?

We will never sell or rent your personal information to other organisations.

In order to deliver our services, we work with selected third-party service providers to process data on our behalf and on our instructions. This is to ensure your personal information and the safeguarding of your privacy is managed efficiently and effectively. In these cases we require that these third parties comply strictly with our instructions and with data protection laws.

Privacy legislation does permit the transfer of personal information outside the EU subject to certain conditions.

Circumstances under which we may disclose your personal information to third parties:

- Where we have your consent to do so.
- You have explicitly consented to sharing your personal information with specific named visiting companies whose performances you have attended.
- You have explicitly consented to sharing your personal information with specific named promoters, organisations or venues whose performance you have attended.
- When we use other companies to provide services on our behalf, e.g. processing, mailing or delivering orders, answering customers' questions about products or services, sending mail and emails, customer analysis, assessment and profiling, targeted digital display advertising, and when using auditors/advisors or processing credit/debit card payments
- When the data is anonymised, and is submitted to support industry benchmarking and research such as that commissioned by Arts Council of Wales.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity.
- We are required by law or requested by the police or a regulatory or government authority investigating potentially illegal activities. We may also disclose personal information to appropriate third parties to assist in anti-fraud checks and investigations and for purposes of taxation.
- We carry out due diligence checks and have subscribed or entered into contracts with our third-party service providers.

6/ Your details on the web

This section outlines how your details are used by us on the web.

6.1 Cookie Notice

Cookies are small pieces of information that are stored by your browser on your computer or mobile phone's hard drive when you browse a website.

For more information on cookies, please visit: allaboutcookies.org

Cookies help us by:

- Making our website work as you would expect.
- Remembering your settings during and between visits.
- Improving the speed/security of the site.
- Allowing you to share pages with social networks like Facebook.
- Continuously improving our website for you.
- Making our marketing more efficient (ultimately helping us to offer the service we do at the price we do).
- Granting us permission to use cookies.

If the settings on your browser that you are using to view this website are adjusted to accept cookies, we take this, and your continued use of our website, to mean that you are fine with this. You may wish to remove or not use cookies from our site, however doing so will likely mean that our site will not work as you would expect.

How Long Do Cookies Last?

When a web server sends a cookie, it asks your browser to keep that cookie until a certain date and time. These dates can be:

Some date in the future – which might be a few minutes or a few hours from now (to track something like your shopping cart in an online store). The cookie might expire many years in the future, to keep track of your browser for a long time.

When you close your browser – this is called a session cookie, the next time you start your browser these will have vanished.

Some date in the past – this is how the server asks a browser to remove a previously-stored cookie.

What Cookies Do We Use?

a) Our Cookies

We use cookies to make our website work including:

Remembering if you have consented to the use of cookies.

b) Third-party functions

Our site, like most websites, includes functionality provided by third-parties.

Providing our online ticketing service:

We use a third-party to process our mailing sign-ups, online ticketing and donation functions. The third-party uses cookies to manage the shopping baskets on our ticketing pages, as well as logging in and using your account pages. The cookies used for these functions are temporary cookies that are removed once the transaction has been completed or you log out. It is not possible to purchase anything on our website without accepting these cookies.

Additional functionality:

Our site includes the following third-party functions which use cookies:

Youtube– an embedded video streaming service

The privacy implications on this will vary from social network to social network and will be dependent on the privacy settings you have chosen on these networks.

Disabling these cookies will likely break the functions offered by these third-parties.

Anonymous visitor statistics cookies

We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using, how long they spend on the site, what page they look at, etc. This helps us to continuously improve our website. These analytics programmes also tell us, on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before, helping us to develop our services for you.

Cookies used by Instagram and Facebook, including Advertising or targeting cookies:

These cookies provide information on visitors to Instagram and Facebook, check whether users are logged in to either platform and set application cookies for Instagram and Facebook.

Typically, these types of cookies are used to deliver adverts, which will be more relevant to you and your interests. They are also used to limit the number of times you see an advertisement and to help measure the effectiveness of the advertising campaign. They are normally placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Targeting or advertising cookies will often be linked to site functionality provided by the other organisation.

We use 'Advertising' cookies on the Mwldan website to:

- Link to social networks, like Facebook, who may use information to provide targeted advertising to you on other websites.
- Identify that you have visited the Mwldan website, to show you relevant adverts from us.
- Provide advertising networks with information on your visit so that they can present you with adverts that you may be interested in.

Turning Cookies Off

The majority of web browsers (Firefox, Internet Explorer, Google Chrome, Opera,

Safari, etc.) will allow you to block/delete cookies from your device via your browser settings. We suggest consulting the Help section of your browser or taking a look at the allaboutcookies.org website, which offers guidance for all modern browsers.

To opt out of being tracked by Google Analytics across all websites, visit <https://tools.google.com/dlpage/gaoptout>.

7/ Individual Rights

1. **Right to Access:** Individuals can request information about their personal data and how it is processed (commonly known as a "data subject access request"). We have an obligation to provide you with information relating to how we process your personal information, our retention periods, and who it will be shared with. This is called "Privacy Information". This privacy policy is our main method for providing you with this privacy information but we may do so using other techniques. Please also refer to our [Freedom of Information Policy](#).
2. **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete personal data. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. **Right to Erasure:** Individuals can request the deletion of personal data when it is no longer necessary for the purposes it was collected. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
4. **Right to Restrict Processing:** Individuals can request limits on processing their personal data in certain circumstances.
5. **Right to Data Portability:** Individuals can request their data in a structured, commonly used format for transfer to another service.
6. **Right to Object:** Individuals can object to processing based on legitimate interests or direct marketing. We process certain personal information by your consent and you have the right to withdraw this at any time. This does not affect your other rights under GDPR.

Any requests or objections should be made in writing to Mwldan's marketing department

Theatr Mwldan
Bath House Road
Cardigan
Ceredigion
SA43 1JT

Email: marketing@mwldan.co.uk

8/ Where to go if you want more information about your rights or to make a complaint

If you are unhappy with the way in which your personal data has been processed you may in the first instance contact the University Data Protection Officer using the contact details above. If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

www.ico.org.uk

9/ Updates to this Privacy Policy

We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy notice from time to time to

keep it accurate and up-to-date.

We will keep this policy under regular review to ensure it is accurate and kept up to date.

Monitoring and Review

A formal review of this policy will take place annually unless there is a significant change in relevant legislation which triggers an early review. Changes will be communicated to all staff, trustees, volunteers, and patrons.

Review date: July 2026

Next review due: June 2027

Reviewed by: Policy Working Group, Tamsin Davies, Head of Marketing and Communications, lead