

## Privacy Policy

Company Chordelia is committed to protecting your privacy. We will only use information about you in accordance with the General Data Protection Regulations (GDPR) and other relevant legislation and regulations.

Our Company Privacy Policy is set out below; please read it with care as it describes how we will process your data.

This Privacy Policy notice explains:

- what information we may collect about you;
- how we keep your information safe;
- what we may use your information for;
- who we may share your information with;
- your rights regarding the personal information you provide to us.

For the purposes of the Data Protection Act 1998 / General Data Protection Regulation, Company Chordelia is the Data Controller. If you have any questions regarding our Privacy Policy or any data protection matter, please contact [info@chordelia.co.uk](mailto:info@chordelia.co.uk) or write to Company Chordelia, Blue Square Offices Ltd, 272 Bath Street, Glasgow, G2 4JR.

### Why we process your personal information

Generally, the lawful basis on which we process your information is the fulfilling of your engagement agreement or contract of employment with Company Chordelia. However, Company Chordelia relies on several legal bases to use and process personal information about you, including that the processing is necessary for:

- Company Chordelia's legitimate interests to establish and manage our relationship with you and for related functions including for personnel and administrative purposes, such as:
  - Business processes such as maintaining organisational and statutory records, planning, transactions, business continuity, diversity monitoring and labour risk prevention.
  - The security of the workplace, assets, workers and the personal information of workers including monitoring, as described below.
  - Programs and policies on training and development, planning, and organisation.
- The performance of employment and services contracts, including human resource administration, payroll and provision of benefits.
- Compliance with applicable laws and regulations and the Company's legal obligations, such as accounting and tax requirements and in relation to staff insurance and pensions.
- For the purposes of carrying out the obligations and exercising rights under charity and employment law.
- For the purposes of preventative or occupational medicine or to assess the working capacity of our workers.
- Establishing, exercising or defending legal claims.

- Where applicable, on the basis of your consent (for example, enrolment in voluntary programs or benefits at your direction), from which you may subsequently withdraw at any time by contacting us, without affecting the lawfulness of processing based on consent before its withdrawal.

Will only use your personal data for the purposes for which it was collected, unless we reasonably consider that we need it for another purpose that is compatible with the original purpose and there is a legal basis for the further processing and where we have provided notice to you.

### **Data protection principles**

We comply with applicable data protection law. This means that when processing personal information for any purpose we must ensure it is:

- Used lawfully, fairly and in a transparent manner.
- Collected only for valid purposes that have been clearly explained and not used in anyway that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up-to-date.
- Kept only as long as necessary for the purposes we have informed you about. Kept securely as detailed below.

We expect all staff to follow these privacy principles when processing personal data on our behalf.

### **Data Security**

When we collect personal data from you we store it under strict safekeeping and confidentiality measures. We use technical and organisational security measures to protect it against misuse and any external data processing services we use must meet our security policies.

We allow only those staff members who need to process your data to have access and prevent all other staff from seeing it. We meet the protection offered to you under the Data Protection Act 1998 and other applicable data protection laws.

### **Children, Young People and Vulnerable Adults**

We are committed to safeguarding children, young people and vulnerable adults who work with Company Chordelia, whether on stage or joining an Education project. An important part of doing this is to protect their privacy.

In line with the UK Government's proposed Data Protection Bill we require parent/guardian consent for the use of personal data and before obtaining personal information for children under the age of 13; we require consent from all individuals aged 13 or over.

### **What we do with your data**

We will keep information which identifies you only if you are a job applicant, an employee or engaged by Company Chordelia. This information may be collected by Company Chordelia and also, when lawful, from third parties in the course of our business activities, and this may take place prior to and during the work relationship. This personal information may include: your

application materials; offer letter; any subsequent contractual details; professional correspondence with or about you; salary and other compensation details; benefits forms; and performance appraisals.

These documents may contain, amongst other information:

- your name, and any former names
- your home address, and former addresses
- phone number
- date of birth
- email address
- names of any next of kin
- emergency contact details
- bank account details
- Curriculum Vitae (CV)
- educational history
- NI number
- employment records such as notes from appraisals and attendance records
- details about your health and your sickness absence record
- holiday records
- your contractual pay and any benefits or allowances
- performance ratings and disciplinary records
- trade union membership
- criminal convictions
- nationality, residency status, passport or visa number
- marital status
- monitoring data such as gender, ethnicity, age, religion, disability

If you are engaged as a performer with Company Chordelia or audition with us we may also hold:

- your image either as film or photograph
- your personal measurements for making costumes

## **Data sharing**

We sometimes have to share your information with third parties to undertake business activities, including but not limited to external suppliers of HR benefits, professional advisers, insurers, service providers, public bodies, or a prospective employer.

For example, your personal information may be sent to the following categories of recipient for the following reasons:

- To external suppliers to administer your benefits on our behalf (e.g. pension providers).
- To our professional advisers and insurers.
- To public corporations, government authorities, HMRC and law enforcement as may be required by law, including regarding tax, national insurance, social security and similar matters.
- To our carefully selected service providers appointed from time to time to provide services related to our organisation and under contract to us. Those service providers will be carefully selected and bound by appropriate contractual protections (such as to use appropriate measures to protect the confidentiality and security of personal data), where required by applicable data protection law.
- To a prospective employer, for example in response to a reference request.

- To external parties as required by law or legal process, or as otherwise authorised by you.
- To statutory and funding organisations.
- To external bodies responsible for carrying out Criminal Records checks.

### How long do we keep your data?

We will only hold your personal information for as long as it is relevant to your working relationship with us or as long as necessary to comply with any legal obligation or to fulfil the above-listed purposes. After the end of your contract with Company Chordelia we will also keep the following types of records for:

Type of Record	Length of Time
Engagement Agreements and Contracts of Employment, HR records, payment records	Stored permanently in the Company Chordelia archive
Performer's costume information	Kept indefinitely in the Company Chordelia archive
Audition records	5 years
Sickness/Occupational Health records	6 years
Recruitment records	6 months

### Access to your information and Opting-Out

We will take all reasonable steps to ensure that your personal information is kept up-to-date and accurate. In order for us to keep your personal information up-to-date, From time to time we may ask you to review and update the personal information we hold.

You have the right to ask for a copy of the personal information that we hold about you, to correct any inaccuracies in that information, object to the processing of such information or ask us to delete such records unless we are prevented from doing so by law, and also have the right to request that such information be ported (transferred) to another organisation or company. We will provide you with a response for any such request in accordance with applicable data protection law. Company Chordelia may refuse to provide such information in limited circumstances under applicable law. If you would like to have a copy of this information, or have a privacy concern or question relating to this notice, for staff matters please contact [info@chordelia.co.uk](mailto:info@chordelia.co.uk) You may also write to Company Chordelia, Blue Square Offices Limited, 272 Bath Street, Glasgow, G2 4JR.

You have the right to complain to the [Information Commissioner's Office](#) if we have not been able to satisfactorily resolve a problem about our handling of your personal information.

### Status and amendments to this notice

This policy notice does not form part of your contract of employment and does not create contractual rights or obligations. The provisions of this notice may be altered by the Company from time to time. Any alteration or addition will be notified to staff in writing, by email or mail.