

Last updated: The Regal Cinema Evesham

May 2018

PRIVACY POLICY

What does this Privacy Policy Cover?

We respect your privacy and are committed to protecting your Personal Data. We want to be transparent with you about how we collect and use your Personal Data in making available our **website, venue and newsletters** (“**Site**”) and tell you about your privacy rights and how the law protects you.

With that in mind, this Privacy Policy is designed to describe:

- Who we are and how to contact us.
- Your rights relating to your Personal Data.
- Marketing communications preferences.
- What Personal Data we collect.
- How we use your Personal Data and why.
- What happens when you do not provide necessary Personal Data?
- Personal Data from Third Party Sources.
- How we use cookies and other tracking or profiling technologies.
- Who we share your Personal Data with.
- How we keep your Personal Data secure.
- How long we store your Personal Data.
- Our policy on children.
- Third party links.

This Privacy Policy aims to give you information on how we collect and process your Personal Data through your use of this Site, including any data you may provide through this Site.

The Privacy Policy is intended to meet our duties of Transparency under the “General Data Protection Regulation” or “GDPR”.

We will post any modifications or changes to this Privacy Policy on this page.

Who we are and how to contact us.

Who we are.

The Regal Cinema Evesham is the Controller (for the purposes of the GDPR) of your Personal Data (referred to as either “the Company”, “we”, “us” or “our” in this Privacy Policy).

Our address is: 41 Port Street, Evesham, Worcestershire, WR11 3LD.

How to contact us.

You can contact us by mail at the above address or by emailing boxoffice@theregal.ac.

Last updated: **The Regal Cinema Evesham**

May 2018

PRIVACY POLICY

Our Data Protection Officer

The GDPR requires us to appoint a “Data Protection Officer”, this is a person who is responsible for overseeing and advising us in relation to our compliance with the GDPR (including compliance with the practices described in this Privacy Policy). If you want to contact our Data Protection Officer directly, you can email Sue Wiper at sue@theregal.ac.

Your rights relating to your Personal Data.

By law you have the right to:

- **Request access to your Personal Data.** This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
- **Object to processing of your Personal Data.** This right exists where we are relying on a Legitimate Interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your Personal Data.** We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data (“**Consent Withdrawal**”). If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our Site. We will advise you if this is the case at the time you withdraw your consent.

Last updated: The Regal Cinema Evesham

May 2018

PRIVACY POLICY

How to exercise your rights

If you want to exercise any of the rights described above, please contact us using the contact details shown above.

Typically, you will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, except in relation to Consent Withdrawal, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact Sue Wiper at sue@theregal.ac.

We will reply to your complaint as soon as we can.

If you feel that your complaint has not been adequately resolved, please note that the GDPR gives you the right to contact your local data protection supervisory authority, which for the UK, is the [Information Commissioner's Office](#).

Marketing communications preferences.

You can ask us to stop sending you marketing messages at any time by contacting us by mail or email or by opting out via the Unsubscribe button on our email newsletters.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us in connection with our confirming transactions such as ticket sales or in responding to your requests for information or confirmation. It will however mean that you no longer receive our newsletters containing information about forthcoming events, special offers and promotions.

What Personal Data we collect.

The Personal Data we collect is outlined in the table below.

Before you read that table, it might be useful to explain what “**Personal Data**” is. Essentially, it boils down to: information about an individual, from which that individual is either directly identified or can be identified. It does not include ‘anonymous data’ (i.e., information where the identity of individual has been permanently removed).

However, it does include ‘indirect identifiers’ or ‘pseudonymous data’ (i.e., information which alone doesn’t identify an individual but, when combined with certain additional and reasonably accessible information, could be attributed to a particular person).

Category of Personal Data collected	What this means
Identity Data	First name, surname, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
Contact Data	Your home address, work address, billing address, email address and telephone numbers.
Financial Data	Your bank account and payment card details.
Transaction Data	Any details about payments to and from you and other details of subscriptions and services you have purchased from us.
Marketing and Communications Data	Your preferences in receiving marketing from us and your communication preferences.
Behavioural Data	Inferred or assumed information relating to your behaviour and interests, based on your online and transactional activity. This is most often collated and grouped into “segments” (e.g., there may be a segment for customers who have attended sports events, or customers who have purchased certain kinds of food at the cinema)
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website or use our services.

Last updated: The Regal Cinema Evesham

May 2018

PRIVACY POLICY

CCTV and telephone recording

In addition to the above, the premises are protected by CCTV for security and staff training purposes and all telephone calls are recorded for training and monitoring purposes. The legal basis for our doing so is our legitimate interest in protecting our staff, customers and premises and for training and managing staff.

Aggregated Data

We also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data, but once in aggregated form it will not constitute Personal Data for the purposes of the GDPR as this data does not directly or indirectly reveal your identity. An example might be when we share the impact of our visitor statistics on the local economy with local government agencies, e.g. what percentage of our customers come from certain postcodes.

No Special Categories of Personal Data

We do not collect any “Special Categories of Personal Data” about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Neither do we collect any information about criminal convictions and offences.

How we use your Personal Data and why.

We will only use your Personal Data for the purposes for which we collected it as listed below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will update this Privacy Policy and we will explain the legal basis which allows us to do so.

What is our “legal basis” for processing your Personal Data?

In respect of each of the purposes for which we use your Personal Data, the GDPR requires us to ensure that we have a “legal basis” for that use.

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your Personal Data.

Last updated: **The Regal Cinema Evesham**

May 2018

PRIVACY POLICY

Purpose	Categories of Personal Data involved	Why do we do this	Our legal basis for this use of data
Account Creation	<ul style="list-style-type: none"> • Identity Data • Contact Data 	To register you as a new customer.	Contractual Necessity.
To process payments	<ul style="list-style-type: none"> • Identity Data • Contact Data • Finance Data • Transaction Data 	To process and deliver your order including manage payments, fees and charges.	Contractual Necessity.
Fraud Prevention	<ul style="list-style-type: none"> • Identity Data • Contact Data 	To keep our website, our services and associated systems operational and secure.	<p>Legitimate Interests.</p> <p>We have a legitimate interest in ensuring the ongoing security and proper operation of our Site and associated IT.</p>
Maintaining the Integrity and Security of our systems	Technical Data	To track issues that might be occurring on our systems.	<p>Legitimate Interests.</p> <p>It is in our legitimate interests to monitor and ensure the proper operation of our Sites and associated systems and services.</p>
Marketing	<ul style="list-style-type: none"> • Identity Data • Contact Data • Marketing and Communications Data 	To form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.	<p>Legitimate Interests.</p> <p>We have a legitimate interest in providing you with updates and related offers where you have purchased or shown interest in similar services from us.</p>
Essential communication	<ul style="list-style-type: none"> • Identity Data • Contact Data 	To inform you of matters which affect you, for example, the cancellation of shows for which you have purchased tickets or of travel issues which may affect your journey.	<p>Legitimate Interests.</p> <p>We have a legitimate interest in providing you with information which it is in your interests to obtain.</p>

What happens when you do not provide necessary Personal Data?

Where we need to process your Personal Data either to comply with the law, or to perform the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the functionalities of the Site).

In this case, we may have to stop you using our Site or terminate our contract with you but we will notify you if this is the case at the time.

Personal Data from Third Party Sources

We do not collect Personal Data from third party sources.

How we use cookies and other tracking or profiling technologies.

Cookies.

Cookies we use

The only external cookies we use are from google for google analytics.

Type of cookie	Purpose
Essential Cookies	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site and help the content of the pages you request to load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
Functionality Cookies	These cookies allow our Site to remember choices you make when you use our Site, such as remembering your previous selections. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.

Last updated: The Regal Cinema Evesham

May 2018

PRIVACY POLICY

<i>Social Media Cookies</i>	These cookies are used when you share information using a social media sharing button or “like” button on our Site or when you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Google+.

Disabling cookies

You can typically remove or reject cookies via your browser settings. To do this, follow the instructions provided by your browser (usually located within the “settings”, “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognise your computer or mobile device and you may need to log in every time you visit our Site.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com.uk.

Who we share your Personal Data with.

We do not share your personal data with third parties.

Data transfers

Because we do not share your personal data with third parties, it follows that we do not transfer your Personal Data to any parties located outside the European Economic Area.

How we keep your Personal Data secure.

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We limit access to your Personal Data to those employees and other staff who have a business need to have such access. All such people are subject to a contractual duty of confidentiality.

Last updated: The Regal Cinema Evesham

May 2018

PRIVACY POLICY

We have put in place procedures to deal with any actual or suspected Personal Data breach. In the event of any such breach, we have systems in place to work with applicable regulators. In addition, in certain circumstances (e.g. where we are legally required to do so) we may notify you of breaches affecting your Personal Data.

How long we store your Personal Data.

We will only retain your Personal Data for so long as we reasonably need to use it for the purposes set out above unless a longer retention period is required by law.

The table below shows our standard retention practices:

Category of Personal Data	Retention period
Behavioural Data	For so long as you remain a customer of ours.
Marketing and Communications Data	For so long as you remain a customer of ours.
Contact Data	For so long as retention is necessary to fulfil the Purposes/Use for which it is used

Our policy on children.

This Site is not intended for children below 16 and we do not knowingly collect data relating to such children. When we sell children's tickets or Family Tickets, the data we hold relates only to the adult who purchased the tickets.

Third party links.

This Site may include links to third-party websites, such as Facebook, Twitter or Trip Advisor, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your Personal Data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every site you visit.

May 2018