



GDPR

General Data Protection Regulation

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The **EU General Data Protection Regulation (GDPR)** effective from May 2018 gives all EU citizens more rights and protections for their personal data, to minimise the possibility of theft and fraud.

These regulations include provisions for the following areas:

The right to be informed:

Companies must publish a privacy notice, in addition to explaining transparently how they use this personal data.

The right of access:

Individuals will have the right to demand details of any of their data that a company may hold. This information must be provided within one month of request at no charge to the individual.

The right to rectification:

If a person's data is incorrect or incomplete, he or she has the right to have it corrected. If the company that holds the information has passed any of that information to third parties. The company must inform the third party of the correction and inform the person which third parties have their personal data.

The right to be forgotten:

A person may request the removal of his or her personal data in specific circumstances.

The right to restrict processing:

Under certain circumstances, an individual can block the processing of his or her personal data.

The right to data portability:

A person can access their data for their own use anywhere they prefer.

The right to object:

A person can object to the use of their personal data for most purposes.

White Bear Theatre Privacy and GDPR Policy

1.0 Our core principles regarding user privacy and data protection

- User privacy and data protection are inviolable human rights
- We have a duty of care to people contained within our data
- Data is a liability: it should only be collected and processed when absolutely necessary
- We despise spam in all its forms
- We will never sell, rent or otherwise distribute or make public any personal information

2.0 Relevant legislation

Alongside our business and internal computer systems, White Bear Theatre's website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- EU General Data Protection Regulation 2018 (GDPR)
- Australian Privacy Act 1988 (APA)

This site's compliance with the above legislation, all elements of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0 below) for clarification.

3.0 Personal information that this website collects and why we collect it

This website collects and uses personal information for the following reasons:

3.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction.

We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to track their journey through the website.

Although GA records data such as your approximate geographical location, device, internet browser and operating system, none of this information personally identifies you to us.

GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on Google's developer guides.

For your information our website uses the Wix implementation of GA.

[Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.](#)

3.2 Contact forms and email links

Should you choose to contact us using the contact form via our [Contact us page](#), none of the data that you supply will be stored by this website or passed to/be processed **only by** any of the third party data processors defined in section 6.0 below.

Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

3.3 Email newsletter

If you choose to join our regular newsletter mailings (which is sent via email), the email address that you submit to us will be stored in our Wix website platform in the 'Shout Out' database, which we use for our email marketing. We consider Wix to be a third party data processor (see section 6.0 below). The email address that you submit will be stored within this website's own database but **not** in any of our internal computer systems.

Your email address will remain within the Wix 'Shout Out' database on our website for as long as we continue to use the Wix platform for email marketing or until you specifically request removal from the list.

You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by [requesting removal via email](#). When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining our email newsletter.

While your email address remains within the Wix 'Shout Out' database, you will receive occasional emails for internal promotion from us.

4.0 How we store your personal information

If you have made a purchase from this website, then your details (not including any financial details) are stored in our Wix 'Engage' database in order that we can fulfil your order(s) and also to refer back to your email and/or postal details in order that we may track any orders you have queries on. Any financial information is not stored or used by us as all our transactions are made within the LineupNow platform which does not retain any financial information once the transaction has been processed.

These are the only occasions where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the content management system that this website is built on (Wix). In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.



5.0 About this website's server

This website is hosted in data centers in the United States and Europe. From time to time, we may transfer hosting from one location to another. Notwithstanding the above, the Wix.com platform complies with the EU-US Privacy Shield Framework and the Swiss-US privacy shield framework as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Union to the United States, and therefore adheres to the Privacy Shield Principles. Wix.com guarantees that the platform will be compliant with the new regulation from May 2018.

All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

6.0 Our third party data processors

We use two third parties to process personal data on our behalf. The third parties we use are **LineupNow** and **Wix**.

LineupNow process payments for any products purchase from our website. Neither us or LineupNow retain any financial information you may submit as part of the purchasing process.

LineupNow, Wix or WHITE BEAR THEATRE will never ask for any sensitive information.

Your data as mentioned below is encrypted before transmission to prevent misuse of the transmitted data by third parties. SSL (Secure Socket Layer) is a security technology which guarantees that your personal data, including credit card information, login data and payment method, are securely transferred via the Internet. The data is encrypted so that is only readable by the LineupNow payment system.

Your data which is encrypted, is as follows:

- personal data (address data, telephone number, etc.)
- login data (username and password)
- all methods of payment selected, credit card and bank account

Wix provide the Customer Engagement platform we use to manage and fulfil your orders. No personal financial information is ever taken or stored in this system as during the process, everything is transferred out to LineupNow so that neither us nor Wix has access to your financial information.

What Wix do to ensure data protection to all our customers

- Wix employ full-time security consultants, dedicated to the security of our customer information.
- Wix is Payment Card Industry Data Security Standards (PCI DSS) compliant and is accredited as a level 1 service provider and merchant. This standard helps create a secure environment by increasing cardholder data, thus reducing credit card fraud. Wix regularly perform internal security audits to maintain our ISO/PCI security certifications, as illustrated below (please click the links to see the Certificates):
 - [ISO 27001:2013 and ISO 27018:2014 Best Practices Certificate](#)
 - [ISO 27108 Certificate](#)
 - [PCIDDS Compliance Certificate](#)
- Wix's signup and login services are completed through a secure server (HTTPS/SSL).



- Wix uses cryptography hash functions to protect your information. Your password is stored as a hash digest and, in the event of a security breach, your original password cannot be recovered from ours or Wix servers.
- Wix is certified under the EU-US Privacy Shield Framework and the Swiss-US privacy Shield Framework as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, and therefore adheres to the Privacy Shield Principles.

Three of the following third parties are based in the USA, UK and one is based in the Republic of Ireland and all are [EU-U.S Privacy Shield](#) compliant.

- Wix ([privacy policy](#))
- LineupNow ([privacy policy](#))
- Google ([privacy policy](#))

7.0 Data breaches

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

8.0 Data controller

The data controller of this website is:

SILVESTER DESIGN, WIX Website developer
Email: contact@silvesterdesign.com

9.0 Changes to our privacy policy

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes.

Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

10.1 Change log

03/03/2017

Privacy policy instigated