

## QUEEN'S FILM THEATRE PRIVACY NOTICE

1. This Privacy Notice tells you what we do with information we collect about you. The notice is addressed to individuals who are customers of Queen's Film Theatre (QFT). We refer to all these individuals as "you" in this notice.

### WHO WE ARE

2. We are Queen's Film Theatre, a two-screen cinema and a department of Queen's University Belfast, a Higher Education Provider (HEP).

### PERSONAL DATA WE USE

3. When you purchase a ticket for an event at Queen's Film Theatre (QFT) online or sign up for one of our membership schemes we will ask for information about you, such as your name, address, date of birth, gender and billing information. This is known as your "Personal Data".

We may also ask you for some special categories of information for reporting purposes (for example ethnic origin, religion, sexual orientation). This is known as your "Sensitive Personal Data".

In line with new regulations, we now take name and telephone numbers for all QFT visitors to aid in NHS Test and Trace. This is done through a secure Microsoft form. You may opt out of this.

### HOW WE USE YOUR PERSONAL DATA

4. We use your Personal Data and Special Personal Data in the following ways:
  - To carry out a transaction with you i.e. to allow you to browse for and purchase tickets and other goods;
  - To provide the benefits of our membership schemes
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements, and (where applicable) to safeguard our staff and other customers / users in respect of unlawful, disruptive or objectionable behaviour in any of our stores or on our site
  - to aid in the NHS Test and Trace scheme, in the case that we discover that a person has visited the cinema while positive for COVID-19.
  - to deliver marketing material and to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the sites.

## LEGAL BASIS FOR COLLECTING AND USING YOUR PERSONAL DATA

5. We will only use your Personal Data if we have valid reasons for doing so and dependent on our activities being carried out. These reasons are known as our “legal basis for processing”. The legal bases for processing your Personal Data are:

- Compliance with legal obligations: we are obliged to comply with UK laws and guidance provided by UK regulatory bodies. In particular, we will need to process your personal information to verify your identity, your source of funds for anti-money laundering and fraud purposes. You will not be able to object to processing or ask for the deletion of your personal information insofar as it falls under this category.
- In the vital interests of public health: we are complying with the NHS Test and Trace scheme in order to make our organisation COVID-secure and prevent the spread of COVID-19. GDPR allows you to request contact information from staff, customers and visitors and share it with NHS Test and Trace to help minimise the transmission of COVID-19 and support public health and safety. It is not necessary to seek consent from each person. **You can opt out of us sharing your information with NHS Test and Trace by emailing us on [qftmanager@qub.ac.uk](mailto:qftmanager@qub.ac.uk).**
- Necessary for the entry into / performance of a contract: When you enter into a transaction with us, a contract between you and us will have been entered into. In order for us to fulfil our obligations under such contract (e.g. to allow you to purchase goods from us), we will need to collect and process your personal information. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing/ exercising your deletion rights will unfortunately mean we cannot provide our goods/ services to you.
- Consent: Please note that we will use your personal information in order to provide certain marketing information for the same or similar services you have previously used. You have the right to withdraw your consent at any time and can object to processing of this nature. Please note: if you withdraw consent for marketing information you will not receive the full benefits of any QFT membership scheme.
- Legitimate interests: To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. Effectively, this requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws. The outcome of this balancing test will determine whether we can use your personal data in the ways described in this privacy policy (except in relation to certain marketing activities, where we will always rely on your explicit consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

## WHO WE SHARE YOUR DATA WITH

6. We can share your information including Personal Data and Special Personal Data with the following parties for the purposes set out above. This is done in line with our Data Protection Policy and Procedures.
  - with third party service providers, such as hosting providers or an email service provider, who provide services to us so that we are able to fulfil our obligations to you or, where we are able to send you marketing information, to do so;
  - if you have donated money to us and have notified us that you are registered for gift aid, we will share your information with HMRC and the Charity Commission for the purposes of administering this;
  - if you have requested that you be added to a marketing list of any of our partners we are running, or have run, an event with during the booking process for that event;
  - if we have a legal obligation to disclose your information (for example, if a court orders us to);
  - with NHS Test and Trace in order to prevent the spread of COVID-19. As noted above **you can opt out of us sharing your information with NHS Test and Trace by emailing us on [qftmanager@qub.ac.uk](mailto:qftmanager@qub.ac.uk)**.
  - If we run an event in partnership with another named organisation we will also share information with that partner to enable it to report to funders and inform audience development strategy. Any data shared for these purposes will be in an anonymised and aggregated form.
  - With funders for reporting purposes. Any data shared for these purposes will be in an anonymised and aggregated form.
7. Sometimes we will not stop using your information when you ask us to, for the reasons described in this notice, but we will tell you about this if you make a request.
8. In other cases, if we stop using your information we will not be able to provide the services that you are asking us to give you. We will tell you about this if you make a request.

## HOW LONG DATA PROCESSING INFORMATION WILL BE KEPT

9. When your data is no longer required for the purposes listed above, we will delete it within the following timescales: after 2 years since last interaction, box office data will be anonymised; after 6 years, sales transaction data will be destroyed
10. If a member has not had a transaction with QFT in over two years we will remove their personal data from our database. Any transactional data will be anonymised in this instance.
11. In the case of information taken in line with X regulations, this data will be destroyed 21 days after your visit.

## YOUR RIGHTS

12. You can contact us at the address above for one or more of the following reasons:
- To ask us to fix information about you that is wrong or incomplete, this is known as your right to rectification.
  - To ask us to delete information about you, this is known as your right to erasure.
  - To tell us you no longer agree to us using your information about you and ask us to stop, this is known as the right to object.
  - To tell us to stop using information about you to sell you products and services, which is known as the right to restrict processing.
  - To make “subject access requests” – which is a request for us to send you the information we have about you
  - To ask us to provide you or someone else (on your request) in a structured; commonly used machine-readable format with the information you have provided to us about yourself. This is known as “data portability” right.
  - To ask us not to use information about you in a way that allows computers to make decisions about you based solely on automated processing.

### **CONTACTING US**

13. The Information Compliance Unit  
Registrar’s Office  
Lanyon South  
Queen’s University Belfast  
University Road  
BT7 1NN
- [info.compliance@qub.ac.uk](mailto:info.compliance@qub.ac.uk)

### **COMPLAINTS**

14. You have the right to complain about how we treat your Personal Data and Special Personal Data to the Information Commissioner’s Office (ICO). The ICO can be contacted at:
- Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **CHANGES TO THIS NOTICE**

14. We may update this Privacy Notice from time to time. We will notify you of the changes where we are required by law to do so.

Last updated: 20<sup>th</sup> May 2021.