

# ETS personal information policy

## Overview

This policy covers the handling of personal information.

## Reasons for holding personal information

ETS holds information about people for the following purposes:

1. to send newsletters by email to people who have opted to receive newsletters by email;
2. to send newsletters by post to people who have opted to receive newsletters by post;
3. to publish biographical information about people who work on productions;
4. to enable authorized users to contact people by email or telephone.

## Nature of personal information

The information held about a person on the ETS database may include one or more of:

1. the person's first and last name;
2. any other name by which they wish to be known (recorded on the database as 'full name');
3. their email address;
4. their home, work, and mobile telephone numbers;
5. their postal address;
6. if they have been or are members of the society, the years and types of their membership; <sup>1</sup>
7. whether they are alive; <sup>2</sup>
8. whether their postal address is valid; <sup>3</sup>
9. whether they are actively involved with the society; <sup>4</sup>
10. whether they wish to be on the mailing list, and, if so, whether they want to be on each of the email or posted newsletter list; <sup>5</sup>
11. their interests (see **Interests**, below);
12. their roles on productions (see **Productions and roles**, below);
13. one or more biographies (see **Biographies**, below).

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<sup>1</sup> One record is held for each calendar year, except for life members. An example is 'individual; 2016', 'individual; 2017', and so on.

<sup>2</sup> Because we wish to continue to show details of past productions, where a person who is credited on a production has died, we retain their details for display. If the person was not credited on any production, their contact details are cleared. When we record any person's death, we remove them from the mailing lists.

<sup>3</sup> If we have received returned mail from their address, we record this by setting the 'valid address' switch off. We retain the postal address until we have determined the person's correct address.

<sup>4</sup> The 'active' switch is set on when a person joins and sends information to be included on the ETS database. After that, whether the 'active' switch is set on or off is largely arbitrary. It is set off when we record a person's death.

<sup>5</sup> A person can be on both and receive newsletters by email and by post. These switches also trigger amendments as described in **Cookies**.

## **Interests**

Interests are roles that people have expressed an interest in working in and which have been recorded on the ETS database.

Examples of interests are: 'actor', 'director', 'wardrobe', 'catering'.

This information may be volunteered by a person or not, by that person's choice. People on the database may have an ID and a password so that they can add or remove interests.

As people can amend their own interests on the database, ETS does not need to remove interests at a person's request. Some ETS database users can amend a person's interests, and they can remove all the interests for a person on request.

## **Productions and roles**

When a person works on a production, their role in that production may be recorded on the ETS database.

The information about people and their roles on productions is a matter of record, and ETS will, on a request from a person, erase all other personal information held about that person except for the person's name and their roles and productions. This exclusion will ensure that our records and history remain complete.

## **Biographies**

The biographies of a person held on the ETS database can be either or both of:

- a. a general biography; and
- b. one or more biographies for a single production.

On the ETS website, a visitor can often click on a person's name to activate a link to view their biography.

ETS will erase a person's biographies on request, and the clickable link on that person's name will not be shown.

## **Consent**

ETS documents that are used to collect personal information from a person will contain a request for that person to agree to the collection and use of that personal information as described in this policy.

Consent will be requested on every occasion on which personal information is collected.

When a person uses an ID and a password to update their personal information on the ETS database, a notice will be shown stating that their updating of that information constitutes consent to ETS collecting and using that information as described in this policy. At that time, the person may view and download a copy of this policy.

## **Right to view**

Every person will have the right to view the personal information held about them on the ETS database, and this can often be accomplished by ETS giving that person an ID and password to view their own information.

In other instances, ETS will prepare the information in a printable format and send that information to the person.

## Erasure

Any person may request erasure of the personal information held about them on the ETS database.

ETS will erase all such information. When ETS has recorded that the person worked on an ETS production, ETS will retain on its database a record of the person's name and of their roles on each production on which they worked.

## Cookies

A session cookie exists only in temporary memory while a visitor navigates the website. All session cookies when the user closes the browser.

A persistent cookie expires at a specific date or after a specific length of time. ETS uses a persistent cookie on its website when an authorized user<sup>6</sup> logs on to the website. This cookie is named 'etsuserid' and persists either until the authorized user logs out of the ETS website or for fifteen days following the latest log on by that authorized user. The cookie contains a unique user number.

## Agents

ETS has the following agents:

1. The Rocket Science Group, trading as MailChimp, which holds names and email addresses of people who are on the ETS database. Removal of a person from the ETS mailing lists causes their removal from the MailChimp lists.  
There may be some people who have joined a MailChimp mailing list independently of the ETS database. In those instances, the person may unsubscribe from the MailChimp lists through a link that appears on all notices sent by ETS using MailChimp.  
ETS may download lists of people's name and email addresses from MailChimp. This information is used only to update a person's email address when that person is also already on the ETS database. No new record is created for any person who is on the MailChimp lists and not already on the ETS database.
2. iTicket.co.nz Limited, trading as iTicket, which books tickets to ETS performances. No information about people is passed to iTicket, which runs a separate database of its customers.

## Third parties

Personal information is not transmitted to third parties.

A third party (such as another theatre or director seeking actors or any other individual or organisation), may request contact details for a data subject (defined as a person whose personal information is on the ETS database). An authorized user<sup>6</sup> may not use the ETS database to provide contact details for a data subject to a third party. Instead, the authorized user will send the contact details of the third party to the data subject, so that the data subject can decide whether to contact the third party.

This section also covers instances when a printed report of people is produced, such as a contact list for a production. ETS must have obtained specific consent from all the people whose information appears on the printed report and must state to the recipients of the printed report that they must not use the information on that report for any other purpose, especially passing it to any third party.

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<sup>6</sup> An authorized user is defined by ETS as someone who may read data on behalf of ETS about other people held on the ETS database. An authorized user may also be able to add and change data held on the ETS database. Authorized users do not include people logging on to the ETS database to access their own information.

## Breach

In the event of a breach of data protection by means of unauthorized use of the ETS database, ETS shall, within 72 hours of becoming aware of the breach, inform the Office of the New Zealand Privacy Commissioner.

## Data protection officer

ETS does not hold any sensitive information about any person.

The information held as described in the section on **Nature of personal information** (including the information further described in **Interests, Productions and roles**, and **Biographies**) will have been added to the ETS database either by or with the co-operation of the person.

ETS does not hold any financial information on its database, such as bank account data or debit or credit card information.

ETS has therefore made the decision to not appoint a data protection officer, as defined in the General Data Protection Regulation (GDPR). One member of the management committee has been appointed as privacy officer under New Zealand legislation, and that person will act as data protection officer for the purposes of the GDPR.

## History of approval and amendment of this policy

Draft	28 May 2018	Approved by management committee.
Version 1	30 May 2018	Revised and approved by management committee.