



Privacy Policy

We believe in respecting and protecting your privacy and being transparent about what we do with your personal data. It's all explained here in a single policy.

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Our contact details

Name: Hilton Amateur Theatrical Society

Address: Hilton Village Hall, Hilton, Derby, DE65 5GH

E-mail: hello@hilton-hats.co.uk

Hilton Amateur Theatrical Society (HATS) is the data controller responsible for the personal information that we collect and process. The Committee has overall responsibility for ensuring that personal data is processed in accordance with this policy and applicable data protection legislation.

Data protection enquiries should be directed to the Society Secretary via the email address at hello@hilton-hats.co.uk. Any requests relating to your personal data, including requests to access, correct or delete your information, should be submitted using this contact address.



How we collect data

Adult members of HATS

For current members of Hilton Amateur Theatrical Society, or those who have submitted an application to join.

Data you give to us		
When collected	Type of data that may be collected	Legal basis
Becoming a Member and managing your membership	Contact details: your name, email address, phone number Data about you: name, age on the date of the first performance, any special needs or requirements that we should be aware of	Legitimate interests
Auditioning for a production	Contact details: your name, email address, phone number Data that identifies you: date of birth Audition choices: roles/chorus auditioning for and roles/chorus you wish to be considered for Data about you: Notes about your performance in the audition (director, musical director, assistant director, independent observer)	Legitimate interests
Assisting in a production	Contact details: your name, email address, phone number Data that identifies you: date of birth Assistance offered: roles you would be happy to help with, e.g. backstage, costume, props, lighting, sound, front of house	Legitimate interests
Performing in a production	Data about you: your name, measurements/sizing for costumes and accessories. Names of character(s) you are playing	Legitimate interests
Promoting a production	Data about you: your name, biography (if applicable). Names of character(s) you are playing, your physical form/appearance (photo/video)	Legitimate interests and/or consent (depending on the nature of the publicity activity and the information being used).
Submitting an expense claim or invoice to us	Contact details: your name, email address Financial information: name of your bank, sort code, account number Expenditure: expenses reference and receipts or invoice, amount	Legitimate interests
Making a payment to us (bank transfer)	Contact details: your name, email address Data about you: new membership or renewal	Legitimate interests



Junior members of HATS

Junior Members and their parents/guardians interact with us slightly differently, and we require slightly more data. Junior members are considered to be those members that are of compulsory school age (in Yr11 or under). Sometimes you give the data to us or we collect it about you automatically. Here is how and when we collect data and the type of data we collect:

Data you give to us		
When collected	Type of data that may be collected	Legal basis
Becoming a Junior Member and managing your membership	- Contact details: parent/guardian name, email address, phone number - Data about your child: name, age on the date of the first performance, any special needs or requirements that we should be aware of. - Data to support child performance licensing and exemption determinations: Name, Address, DOB, School attended, number of days performing in the last 6 months	Consent
Auditioning for a production	Contact details: parent/guardian name, email address, phone number Data about your child: date of birth (if 15 or under), Notes about your child's performance in the audition (director, musical director, assistant director, independent observer) Audition choices: roles/chorus your child is auditioning for and roles/chorus they wish to be considered for	Legitimate interests
Performing in a production	Data about your child: name, measurements/sizing for costumes and accessories. Names of character(s) your child is playing	Legitimate interests
Promoting a production	Data about your child: name, biography (if applicable). Names of character(s) your child is playing, their physical form/appearance (photo/video), performance dates	Consent from a parent or guardian.
Making a payment to us (bank transfer)	Contact details: your name, email address Data about you: new membership or renewal	Legitimate interests



Website, social media users & email queries

You interact with us in different ways and we collect data. Sometimes you give the data to us or we collect it about you automatically. Here is how and when we collect data and the type of data we collect:

Data you give to us		
When collected	Type of data that may be collected	Legal basis
Submitting a new membership enquiry to us	Contact details: your name, email address, phone number Data about you: performance experience, age bracket, vocal range, additional information (free text)	Legitimate interests
Submitting a general enquiry to us	Contact details: your name, email address, phone number Data about you: organisation name (if applicable), enquiry type (Costume hire Props hire Volunteer to help Other) and description	Legitimate interests
Volunteering to help on a production	Contact details: your name, email address, phone number Data about you: organisation name (if applicable), description of your expertise	Legitimate interests
Giving us feedback about a production	Contact details: your name, email address Feedback: production name, feedback Permission: permission to publish your feedback	Consent

As a Member of HATS, we act as the data controller and data processor of your personal data. This means we decide why we collect your data and how we process it.

We generally aim to collect the minimum amount of personal information necessary to administer the Society and its productions.

In some circumstances we may collect limited health or accessibility information, including information about special requirements, medical conditions, allergies or disabilities where this is necessary to safeguard members, support participation in productions, comply with licensing requirements, or make reasonable adjustments. Where such information is collected, it will be treated as special category personal data and will only be processed where we have a lawful basis to do so under UK data protection legislation.

We ask members and parents/guardians to provide only information that is relevant and necessary.

Where our website contains links to other parties websites or social media channels, we do not endorse or approve the content or opinions of any third-party site, nor will we have any liability in connection with them. These sites have their own privacy policy, cookie policy and terms and conditions, which may differ from ours.



Definitions

Legitimate interests - We process your personal data for our legitimate interests, as long as these do not outweigh your rights and interests. Our legitimate interests are:

- Helping individuals to develop their ability and performance confidence through acting, singing and dance/movement
- Helping individuals to develop essential life skills such as communication, team work and social/networking through a shared interest
- Staging productions featuring local talent to enrich the cultural experiences offered to Hilton and the surrounding communities
- Improving how we manage and operate the Society

Where we rely on consent to process personal data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

How we use your personal data

We may only use your data for particular reasons, where we have a legal basis to do so. Here are the reasons for which we process your data:

When collected	How we may use your personal data
Becoming a Member and managing your membership	1 - To administer your / your child's membership 2 - To send you or your parent/ guardian email communications about productions, auditions, news and events 3 - To send you or your parent guardian email communications and/or telephone you about auditioning for and/or helping out on productions 4 - To send you or your parent / guardian email communications regarding the administration of a production you are in, e.g. rehearsal schedules, costume requirements, marketing, subs payments etc.
Making a payment to us (all payment types)	1 - To administer your / your child's membership, ensure that you have paid the relevant membership and show fees and be covered by our insurance policy 2 - To cross-reference any payments you make to the Society by BACS 3 - To keep a log of transactions for accounting and audit purposes
Auditioning for a production	1 - To administer your / your child's application to audition for a production 2 - To support the decision-making process to select the cast for a production 3 - To administer your / your child's membership (if you successfully audition to join the Society)
Performing in a production	1 - To administer the provision and/or hire of costumes/accessories for you / your child's from our own costume store or an external supplier



Photography, Video and Marketing	1 - HATS may take photographs and video recordings during rehearsals, performances and Society events. Images and recordings may be used in: - Show programmes - Posters and flyers - Local press publicity - The Society website - Social media accounts - Historical archives of the Society 2 - For junior members, identifiable photographs and videos used for publicity purposes will only be used with parental or guardian consent. 3 - Members and parents/guardians may withdraw consent for future use of promotional photographs and videos at any time by contacting the Society.
Promoting a production	1 - To use in online and offline marketing campaigns to promote our productions, including but not limited to: website/blogs, social media, direct mailings, email campaigns, local newspapers 2 - To include your / your child's headshot and rehearsal photos in the show programme 3 - To include your / your child's headshot and rehearsal photos in front of house displays for our productions 4 - To publish a cast list on our website, social media and in the show programme 5 - To publish your biography in the show programme
Submitting an expense claim or invoice to us	1 - To pay your invoice or authorised expenses via direct bank transfer 2 - To keep a log of transactions for accounting and audit purposes
Submitting a general enquiry to us	1 - To understand the nature of the enquiry and respond
Volunteering to help on a production	1 - To understand how you'd like to help out and connect you with the appropriate lead contact of the relevant department
Giving us feedback about a production	1 - Feedback that you have sent us and have given us permission to use may be shared as quotes on online and offline marketing campaigns, including but not limited to: website, direct mailings and emails

Where we store your personal data

We have procedures to secure the data we hold physically and electronically. By submitting your personal data, you agree to the transfer of data to us and the storing or processing by us.

The personal data that you provide is processed by individuals, predominantly living in Hilton, who hold a specific role in the operation of HATS and the staging of a production. These roles consist of formally elected roles on our committee: Chair, treasurer, secretary and ordinary committee members and other individuals fulfilling a specific role, for example show manager, wardrobe manager/helpers, director, choreographer, musical director, assistant director, independent audition panel member, marketing manager and website manager.



We use a small number of trusted third-party service providers to assist with the operation of the Society. Details are provided in the section titled "Third Parties Who Process Your Personal Data".

Access to personal data is limited to those committee members, production teams and volunteers who need it to carry out their role on behalf of HATS.

How we keep your personal data secure

We take reasonable and proportionate steps to protect personal data from accidental loss, unauthorised access, alteration, disclosure or destruction.

These measures may include:

- Restricting access to authorised committee members and production teams on a need-to-know basis.
- Password-protected devices and online accounts.
- Secure cloud storage provided by trusted service providers.
- Appropriate deletion or destruction of information when it is no longer required.

Personal Data Breaches

In the event of a personal data breach, HATS will investigate the incident promptly and take appropriate action to minimise any impact.

Where required by law, we will report the breach to the Information Commissioner's Office (ICO) and notify affected individuals.

How long we hold your personal data for

We retain your personal data for different lengths of time, depending on how we use it:

When collected	Retention period
General enquiries	Up to 12 months after the enquiry has been resolved.
Membership enquiries	Up to 12 months after the enquiry has been resolved.
Becoming a Member and managing your membership	Until the end of your membership and for a reasonable period thereafter, unless you request deletion and we have no legal or legitimate reason to retain the information.
Making a payment to us (all payment types)	6 years
Auditioning for a production	Audition form: 6 months



	Audition notes: 1 week (until casting announced)
Volunteering to help on a production	6 months
Performing in a production	6 months
Promoting a production	Production photographs, cast lists, programmes, publicity materials and other historical records may be retained permanently as part of the Society's archive and record of its activities. The Society has a legitimate interest in retaining programmes, cast lists, production photographs and other records of historical significance as part of its archive and history.
Submitting an expense claim or invoice to us	6 years
Giving us feedback about a production	Feedback used for promotional purposes may be retained while it remains relevant to the promotion of the Society and may be archived where incorporated into historical records of productions.

Third parties who process your personal data

Below is a list of third parties who we use to process your personal data, what they collect and the purpose and place of processing.

Service provider	Type of data collected or shared	Purpose	Place of processing
Licencing			
South Derbyshire District Council	- Contact details of members of compulsory school age - Contact details and DBS status of members holding a chaperone role	- To apply for relevant performance licencing for junior members - To obtain and maintain relevant chaperone licenses	UK
Payments			
Lloyds Bank Privacy policy	- Contact details - Data about you - Financial information	- To administer your child's membership and ensure that you have paid the relevant membership and show fees - To issue a refund to you - To keep a log of transactions for accounting and audit purposes	UK



Wix Privacy policy	s	To provide a great experience for your visitors and customers. To monitor and analyze the performance, operation and effectiveness of Wix's platform. To ensure the Wix platform is secure and safe to use.	EU
Google Workspace Privacy Policy	- Data about you - Feedback and permission	To securely store member information relating to performances, and respond to enquiries.	USA
Analytics			
Google Analytics Privacy policy	- How you use our website (anonymous)	To track the use of our website, prepare reports and improve the design/user interface	USA

International Transfers

Some of our service providers may process personal data outside the United Kingdom.

Where personal data is transferred internationally, we will ensure that appropriate safeguards are in place in accordance with UK data protection law, and that personal information continues to receive an appropriate level of protection.

We do not sell your personal data to third parties. We only share personal data where necessary to operate the Society, comply with legal obligations, or use trusted service providers as described in this policy.

Cookies

You can manage or disable cookies through your web browser settings. For assistance, please refer to your browser's current help documentation or support website.

Your data protection rights

You can choose not to give us your personal data. If you choose to do this, you will not be able to become a Member, audition for or perform in a production.



Under UK data protection law, you have the following rights:

- **Right of access** – to request copies of your personal data.
- **Right to rectification** – to request that inaccurate or incomplete information is corrected.
- **Right to erasure** – to request deletion of your personal data in certain circumstances.
- **Right to restrict processing** – to request that we limit how we use your personal data in certain circumstances.
- **Right to object** – to object to processing based on legitimate interests.
- **Right to data portability** – where applicable, to request transfer of your data to another organisation.
- **Right to withdraw consent** – where processing is based on consent, including certain photography and publicity activities.
- **Right to complain** – if you are dissatisfied with how we process your personal information.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

To exercise any of these rights, please contact the Society Secretary at hello@hilton-hats.co.uk.

Updates to this privacy policy

This policy will be reviewed every two years, or sooner if required by changes in legislation or Society practice. When we make changes, we will update the **Last updated** date shown in the footer of this policy and post an update on our website.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact information provided at the beginning of this document.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>



Version	Date	Description
1.0	September 2025	Initial policy
1.1	17 July 2026	GDPR and governance updates, photography consent, data breach and international transfer provisions
1.2	September 2026	Minor formatting and wording updates to ensure legal compliance