

**factory
international**

PRIVACY & DATA PROTECTION POLICY

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1. Introduction

Factory International takes your privacy very seriously and is committed to protecting your personal information.

This policy sets out the way in which personal information you provide to us, or we obtain about you from third parties, is collected, processed, stored and kept secure by Factory International. It applies whenever we collect your personal data, including when you use our web site, other digital platforms, attend our Festivals and use our guest Wi-Fi at Aviva Studios.

We will always aim to be clear and transparent regarding all requests for personal data and are legally bound to only use that data for the express purpose(s) agreed at the point the data is submitted to us.

Please note, individuals are under no obligation to share personal data with us. However, the provision of certain pieces of personal data will help us to provide the best possible service we can.

This policy was last updated in December 2024 and was designed in accordance with the UK General Data Protection Regulation (GDPR).

2. How to contact us about your personal data or the privacy policy

If you have any questions or concerns about the way in which we handle your personal information or would like to request Access, Rectification, Portability or Erasure please address your query via:

Email: [**info@factoryinternational.org**](mailto:info@factoryinternational.org)

Or call: 0161 843 8900

Or write to Factory International, Water Street, Manchester, M3 4JQ.

Under the terms of the GDPR we will respond to you within 30 days.

For further, detailed information on the Data Protection Legislation, please refer to the website of the Information Commissioner's Office.

3. What is Personal Data

Personal Data is anything that can be used to identify an individual directly or indirectly.

In many situations, this can be as simple as their name and contact details (such as address, phone number or email) but may sometimes include more detailed information depending on the nature of their engagement with us.

4. When & how do we collect personal data?

All the following are common situations where we might request personal data from individuals:

- When purchasing tickets for our events

- When signing up to our mailing lists
- When contacting us with customer experience queries
- When signing up to any of our engagement, participation or volunteering programmes
- When applying for a job at Factory International or MIF
- When becoming a supporter/member/donor

We will always make it clear what data we are collecting from an individual during these transactions and why we are requesting it.

5. Image Capture

We may also capture an individual's image in the photography or video recording of an event for promotional purposes, including for print and social media. If an individual would prefer not to be included in any image recording, they should speak to a member of Factory International staff at the venue or staff and volunteers at the Festival. At the Festival staff will be wearing an MIF lanyard at the event and will provide information on how to make sure you are not included. Notices will be posted at the entrance to any venue where photography or video recording is planned with similar information and a QR code that directs individuals to this policy.

All images will be stored on our secure cloud-based system and fall under the remit of our data retention policy. In certain instances, we may ask for consent using a form or agreement to be signed by the individual, which will be kept on file for as long as the resulting footage/image is in circulation. These instances will include:

- Interviews on camera
- Images of event participants
- Images of volunteers

We also use CCTV recording equipment in and around the Aviva Studios venue and at premises and site-specific events during the Festival itself. This is to safeguard our staff, customers, and visitors. Images from the CCTV are securely held for 30 days and (in the event of an incident) may be shared with the police. After this time period, this footage will be erased.

6. Website & Aviva Studios Wi-Fi Data

In addition, the following data may also be collected automatically when you visit our website or use our guest Wi-Fi at Aviva Studios:

- IP address
- Referring website (if you followed a link to get to our website)
- Web browser and device details
- Cookies (see below)
- Time and date of visit
- Web pages visited

- Geographical location

This statistical data is collected with the express purpose of aiding our understanding of the areas of interest on our web site and the guest WIFI service at Aviva Studios and is kept only for as long as is required for this purpose.

7. Customer Experience Data

We may also store conversations that occur via Factory International email channels (e.g. tickets@factoryinternational.org), or via our online chat portal. These emails and transcripts would be stored securely and only used to improve the customer experience and for training and monitoring purposes.

Factory International does not currently record or store any conversations by telephone. We may in the future decide to use call recording technologies for the sole purpose of training, monitoring, and improving the overall customer experience. Should this be adopted, sensitive information (e.g. credit card information) would be completely anonymised.

8. Cookies

A cookie is a small file which asks for permission to be placed on the individual's device's hard drive. If the individual agrees, the file is added, and the cookie helps analyse web traffic or records when they visit a particular site. Cookies allow web applications to respond to the individual. The web application can tailor its operations to their needs, likes and dislikes by gathering and remembering information about their preferences.

At Factory International we use cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to user needs. A cookie does not give us access to an individual's computer or any information about them, other than the data they choose to share with us.

An individual can choose to accept or decline cookies. Most web browsers automatically accept cookies, but individuals can usually modify their browser setting to decline cookies if they prefer. This may prevent them from taking full advantage of the website.

All the above are standard online identifiers which can be detected by Google Analytics – which, like many other organisations we use to monitor the activity on our website. Please 4.5 visit Google Analytics Terms of Service for further details.

9. Third Party Website Links

Our website and associated electronic communications may contain links to other websites not operated or controlled by us ("Third Party Sites"). The policies and procedures detailed in this policy do not apply to such sites. Factory International takes no responsibility for the content or data processing activities and policies of third-party sites.

10. How we use personal data

All personal data collected, processed, and stored by Factory International is only collected with the prior notification of the scope and nature of the processing activity (i.e. how it will be used).

In relation to the personal data listed above, this will include 'opt in' and/or 'permission' on online forms regarding mailing lists, participation sign up or the provision of details on a job application or engagement with us contractually.

In advance of any data processing activities, we complete and log an internal data activity. This document details the scope of activity and how and why the data is being processed.

This then forms the basis of a Privacy Notice – which is included on any digital or paper form which requests the submission of personal data.

11. Security & Storage of Personal Data

Factory International operates a secure, cloud based and closed IT system with access controlled by a centralised IT Administrator. We also operate our own internally managed ticketing and CRM system, which ensures that the majority of our data processing is not run via a third party and remains the responsibility of Factory International.

Factory International IT devices are encrypted to enable us to deal with any breaches of data security quickly and responsibly. We also have both IT and reporting processes in place to comply with breach notification obligations to the Information Commissioner's Office (ICO), and to our CRM system provider.

On an annual basis we will audit all data and either erase, deactivate or anonymise that data.

The only exception to this is Employee records (which we are obliged by law to maintain for seven years).

12. Why we use personal data

We process personal data to:

Fulfil a Contract (e.g. to provide a ticket for an event). This sort of processing includes name, address, phone, email and credit card details and any access-specific information that a purchaser may choose to share with us in advance of attending one of our events.

Communicate on a Consent basis. This includes some elements of direct marketing (e.g. signing up to and having granular access to different strands of e-communication from us or using such emails to communicate additional offers/opportunities to members or participants who have signed up to receive them).

Fulfil Legal Obligations, which covers employment/engagement details for those working for, with and in association with us. It also covers data capture relating to safeguarding (e.g. children and vulnerable adults).

As part of the work we do to help us understand the individuals, businesses and trusts or foundations who might be interested in supporting the work of Factory International, we might seek additional information relating to a small number of individuals. This could include Factory International booking information and connections, business network information, and publicly available information relating to place of residence, wealth and assets, family*, career, donations to other organisations, and other interests.

* This does not include information about children unless given personally by the individual concerned

To help us improve the technical experiences of our web site and Aviva Studios Wi-Fi service.

13. Individual's rights

As a Data Subject, individuals have legal rights regarding the information we hold about them.

Access – the right to know what personal data is being processed and how. Individuals can therefore request access to the personal data we process.

Rectification – the right to ask us to amend, update or correct any personal information we have.

Portability – the right to receive their personal data held by us in a format that can be transferred to another data controller.

Erasure – the right to be forgotten – i.e. for us to erase any personal data we possess (except for employee records and records of financial transactions which are detailed in our audited accounts).

If an individual would like to request Access, Rectification, Portability or Erasure of information we hold about them, they should contact us using the details in the 'Contact' section. The individual will need to provide us with a description of the information they would like to see, together with proof of their identity.

If they are unhappy with the way we have processed their personal data, they also have the right to lodge a complaint with the Information Commissioner's Office.

14. Exclusions (legal & regulatory)

On rare occasions we may disclose Personal Data if required to do so by law in order to (for example) respond to a legal challenge, a court or government agency, or in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect or defend our rights in a court of law
- Protect against legal liability
- Co-operate with the Police or a regulatory or government authority investigating illegal activities

15. Third party contractors

In some instances, we use established and accountable third-party service providers who work on our behalf for the fulfilment of a contract we enter into

Examples include:

- Card payment processing of transactions relating to payment for goods and services (e.g. online ticket sales)
- Third party mailing houses, email providers (e.g. Dot Digital) and marketing agencies
- Our website hosting and ticketing/CRM system providers
- Our captive portal provider for the guest Wi-Fi at Aviva Studios
- Third party ticket agents, theatres, performance venues and arts venues to fulfil operation of a related event
- Research Companies who help us to understand our audience to enable us to improve our service
- Third party advertisers (such as Facebook or Google)

Anyone who provides a service such as these on our behalf will enter into an agreement with us and will meet our data security standards. They will only use your data for the clearly defined service that they are providing on our behalf and are, in effect accountable in terms of complying with this policy.

As Factory International is partially funded by Public Sector bodies (including the Arts Council and Manchester City Council) we also need to provide a range of quantitative and qualitative data in order to support such funding. The majority of this data is anonymised and for the express purpose of meeting our conditions of funding.

Only in situations where an individual has actively given consent for us to do so, we may pass on their data to partner organisations such as co-commissioners for events. In these instances, if they wish to opt-out of their communications in future or to request Access, Rectification, Portability or Erasure of their data, they should contact the partner organisation directly.

NOTE: Factory International may depart from the precise requirements of the policy where it considers that is necessary, provided that certain statutory criteria are met.