



Privacy Policy

Policy Information	
Organisation	Underground Lights
Scope of policy	This policy explains how we collect and use your personal data and cookies when you use our website, and outlines your rights under UK data protection law.
Policy operational date	May 2018
Date of approval	May 2025
Date of past reviews	May 2018
Date of review	May 2025
Date of next review	May 2026

1. Background and scope

This privacy policy explains what personal data we collect, how we use it, your rights, and how we protect your information. It covers our use of cookies, third-party services, and how to contact us if you have questions.

Underground Lights is committed to protecting your privacy and personal data. This policy sets out how we collect, use, store and protect your personal data when you use our services or visit our website.

2. Who we are

Underground Lights is a participatory arts organisation working with people experiencing homelessness and/or mental health challenges. For data protection legislation, the data controller is:

Underground Lights Community Theatre
Belgrade Theatre
Corporation Street
COVENTRY
CV1 1GS
E-mail: info@undergroundlights.org

Registered charity number: 1179553

The contact for data protection matters is: Chris Campbell

3. Your data protection rights

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

- **Right to access** – You can request copies of your personal data.
- **Right to rectification** – You can request correction of inaccurate or incomplete data.
- **Right to erasure** – You can ask us to delete your data in certain circumstances.
- **Right to restrict processing** – You can ask us to limit how we use your data.
- **Right to object to processing** – You can object to our processing of your data in certain circumstances.
- **Right to data portability** – You can request that we transfer your data to another organisation.

To exercise any of these rights, please contact us using the contact details above. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Web: ico.org.uk

Tel: 0303 123 1113

4. What personal data we collect and how

We collect data in the following ways:

- **Directly from you:** e.g., when you fill in a form, book a ticket, make a donation, or contact us.
- **Automatically:** e.g., via cookies on our website.
- **From third parties:** e.g., ticketing platforms, mailing services.

Data we may collect includes:

- Name, email address, phone number, postal address
- Access needs or dietary requirements (for events)
- Payment or donation information (processed securely by third parties)
- Technical data like IP address, browser, and device type

5. Legal basis for processing

We process personal data only when we have a lawful basis. These include:

- **Consent:** when you give us clear permission (e.g., signing up for our newsletter)
- **Contract:** to provide a service you've requested (e.g., ticket purchases)
- **Legal obligation:** to meet legal requirements (e.g., financial records)

- **Legitimate interest:** where processing is necessary for our work and your rights don't override those interests

6. How we use your data

We use your data to:

- Manage bookings and registrations
- Communicate with you about events or updates
- Process donations or payments
- Run surveys and gather feedback
- Improve our services and website
- Meet our legal obligations

We do not sell or rent your personal data.

7. Sharing your data with third parties

We may contract with third-party providers to deliver services on our behalf, such as email communications, ticketing, event registration, and website hosting. These include:

- WordPress: website hosting and management
- Eventbrite: event ticketing and registration
- Jotform: web forms and surveys
- TicketSource: ticket sales and distribution
- Mailchimp: e-mail delivery

We have reviewed their privacy policies and data processing terms to ensure they align with UK data protection requirements.

Some of the third-party services we use may store or process your data outside the UK or European Economic Area (EEA). Where this occurs, we take reasonable steps to ensure your data is protected in accordance with UK GDPR, including relying on international data transfer mechanisms such as adequacy decisions or standard contractual clauses.

8. Data retention

We retain your personal data only for as long as necessary for the purposes outlined in this policy, and in line with our internal data retention schedule. We review personal data annually and securely delete what is no longer needed.

9. How we protect your data

We take appropriate technical and organisational measures to protect your data from unauthorised access, use, loss or disclosure. These include:

- Password protection and user access controls

- Secure cloud storage
- Staff training and confidentiality agreements
- Regular review of third-party providers' security practices

10. Cookies

Our website uses cookies to improve user experience, analyse traffic, and deliver some services. You can manage your cookie preferences through the cookie banner on our website. You can also change your browser settings to delete or block cookies.

You can view a current list of cookies used on our website's [Cookie Policy page](#).

11. Changes to this policy

We may update this policy from time to time. The latest version will always be posted on our website.

If the changes are significant, we'll notify you by email (if we have your contact details) or by a notice on our website.

12. Contact us

If you have any questions or concerns about this policy or how we handle your data, please contact:

Chris Campbell

E-mail: info@undergroundlights.org

Post: Underground Lights, Belgrade Theatre, Corporation Street, COVENTRY CV1 1GS