



## **Traverse Theatre – Customer Privacy Notice**

Welcome to the Traverse Theatre's Customer Privacy Notice.

The Traverse Theatre respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

The safety of your data is important to the Traverse Theatre. Please read this Customer Privacy Notice below.

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how the Traverse Theatre collects and processes your personal data, including through your use of our website which will include any data you may provide through our website when you sign up to our newsletter, purchase tickets, sign up to our events programme, sign up to our ticket waiting list, make a donation, or take part in a competition.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Controller**

Traverse Theatre (Scotland) Ltd, a registered charity with registered number SC002368 and having its registered office at 10 Cambridge Street Edinburgh, is the

controller and responsible for your personal data (collectively referred to as "Traverse", "we", "us" or "our" in this privacy notice).

You can contact us at:

Traverse Theatre  
10 Cambridge Street, Edinburgh,  
Scotland, EH1 2ED

Administration team on [info@traverse.co.uk](mailto:info@traverse.co.uk)

You can find a full list of contact details on our website.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues [www.ico.org.uk](http://www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

We regularly review our privacy policy and will place any updates on this webpage, which you can access at any time by logging into your customer account or by accessing our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for, nor have jurisdiction to, their privacy policies.

Nonetheless, the Traverse carefully selects any partner platforms appointed to support its work and will take all reasonable endeavours to review third-party privacy policies to ensure that are aligned in scope to the Traverse's own.

## **2. What information do we collect about you?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We ask for certain personal information about you when you purchase a ticket for one of our events, or shows, when you make a donation, create a customer account or

sign up for our email newsletter. You might supply this information online, by phone or in person.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.

**Contact Data** includes billing address, delivery address, email address and telephone numbers.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Access Data** as part of your customer profile you are invited to opt-into providing details about you access requirements, which can help us ensure we support you when visiting the theatre and access our services.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for various purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to

provide you with your tickets for a show). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

#### **Direct interactions**

You may give us your Identity, Contact and Financial Data by filling in forms, speaking to us in person at the box office, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- buy tickets for shows or events;
- participate or apply to participate in projects, workshops or other events we run or provide access to (including scriptwriting, educational, theatrical or other creative ventures);
- make a donation;
- sign up to our waiting list;
- create an account on our website;
- subscribe to our publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

#### **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information when you access a website. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information, please see our Cookies Policy.

You can set your browser not to accept cookies but in a few cases some of our website features may not function as a result.

**Third parties or publicly available sources.** We may receive personal data about

you from various third parties as set out below:

Technical Data from the following parties:

- analytics providers such as Google, Facebook, based outside the EU;
- advertising networks Facebook, Google based outside the EU;
- Email marketing platform such as DotMailer based in the EU, Australia and the United States of America
- Social media sites such as Facebook, X (Twitter), Tumblr, Instagram, YouTube, and Soundcloud, all based outside the EU
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Spektrix based inside the EU
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### **4. How will we use the information we collect about you?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Apart from when you sign up to receive marketing from us, we generally do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email where you have expressly consented to this. You have the right to withdraw consent to marketing at any time by contacting us at [info@traverse.co.uk](mailto:info@traverse.co.uk)

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact

us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

We use the information collected from you when you use our website, to monitor in a general manner, how and when audiences are accessing and using our website so we can continue to make it as easy to use and useful as possible.

The Traverse Theatre will never share your information for marketing purposes with any other organisations without your explicit consent.

We use the information requested when you purchase a ticket for one of our events to, make a donation, sign up to be on a waiting list, purchase a ticket for a show, sign up to an event, create a customer account or sign up for our email newsletter for the following purposes:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
If you agree, to contact you by email or post about other productions or events which we believe are likely to be of interest to you	(a) Identity (b) Contact (c) Marketing and Communications	(a) Consent  (b) Necessary for our legitimate interests by mailing customers details of relevant events that are similar to ones that have attended in the past, and to sell tickets to the public in order to fulfil our mission
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To keep your details up to date and process any brochure returns	(a) Identity (b) Contact (c) Marketing and Communications	(a) necessary to comply with a legal obligation: -for any brochures that are returned to us, customer details are removed from the mailing system in order to prevent spam mail and protect personal data.
To process a donation, you have made including (a) record relationship with you and record marketing data preferences  (b) to keep a history of previous donations you have made	a) Identity (b) Contact c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services), to note how you prefer to be communicated with
To process and deliver your ticket order	(a) Identity	(a) Performance of a contract with you  (b) Necessary for our legitimate interests

<p>including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) to let you know of any changes to the performance for which you've booked (such as a change of venue or cancellation)</p>	<p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(to recover debts due to us)</p>
<p>To process customer address slips for refunds</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>(a) Necessary for our legitimate interest to process a customer refund efficiently</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) to respond to any comments or feedback you supply and provide customer services</p> <p>(d) contacting you about lost property items</p> <p>(e) to support your access needs</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Access</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) and to provide a high level of customer service</p> <p>(d) Necessary in response to a defined request from you</p> <p>(e) Necessary to deliver our contract of service with you and to meet our legal obligations</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business), provide information</p>

	(d) Usage (e) Marketing and Communications	about our audience demographic and receive public funding
To improve our and protect our business by: (a) administering and protecting our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) (b) by protecting ourselves against, investigate and deter against fraudulent, unauthorised or illegal activity	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver a better service to you: (a) To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you (b) to better understand how you and others are interacting with the Traverse Theatre so we can continue to improve our services	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) access	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop

relationships and experiences		our business and to inform our marketing strategy)
To use data analytics to collect a single list of data of clients with similar characteristics or behaviours	(a) Identity (b) Contact (b) Usage (c) Profiling (d) Technical (e) marketing and communications	Necessary for our legitimate interests (to develop our products/services and grow our business) to qualify for present and future public funding.  We must provide information about the demographics of our audience in order to develop our business, and to meet legal obligations to core funders (national/local government).
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Access	Necessary for our legitimate interests (to develop our products/services and grow our business)
To invite you to events that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business) and to provide you with services that you may be interested in.
To offer educational events: (a) to maintain relationships with schools in the Edinburgh area, (b) to maintain contract with Creative Learning, (c) to record previous applicants and events to improve services	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests: (a) To develop our products/services and grow our business), (b) To fulfil and to provide you with services that you may be interested in. (c) To offer creative opportunities to schools and previous applicants (d) To offer educational events and workshops to develop skills which are in line with our public mission.
To invite press and journalists to events that may be of interest, giving press contact details to	(a) Contact (b) Identity (c) Marketing and	(a) Necessary for our legitimate business interests to invite journalists to events, promoting our events, to promote the

visiting companies and recording press lists	Communications (d) Technical (e) Profile	Traverse's public profile, (b) Necessary for performance of a contract to issue tickets to attending journalists
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We would like to send you information about other productions and events we think you might be interested in and keep you up to date with news from the Traverse. We will ask you for, or have previously requested from you, additional permission to do this. **You can opt out** of these or modify your preferences at any time by logging into your online account. If you allow us to contact you with marketing messages, you are able to opt out of receiving them at a later date.

Every marketing email we send contains an **Unsubscribe link you can use to opt out** of these messages at any time, or you can contact us at [info@traverse.co.uk](mailto:info@traverse.co.uk) to be removed from our marketing mailing lists.

Please note that should you choose to opt out of marketing emails, we may still contact you with customer service information and important information about your account and orders, as part of our contract of service.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage, Access and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased tickets from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your **express opt-in consent** before we share your personal data with any company outside the group of companies for marketing purposes.

When you place an order for a production which has been produced by an organisation other than the Traverse Theatre, you will be asked if you would like to receive marketing communications from them in the future, at which point you may opt in or choose not to do so.

If you opt in, we will provide your postal and email contact data to the third-party producer. You may update your third-party contact preferences at any time in Your

Account.

Please note that this Privacy Policy applies only to the Traverse Theatre, so we recommend that you read the privacy policies of any other organisations whose marketing communications you choose to opt in to.

The Traverse Theatre uses a number of data processors, such as Spektrix who provide our box office system, in order to help us provide the services you request. These organisations are obligated to act on our instruction in relation to their use of your personal data and do not have any control over your data in their own right, and are not able to contact you. We make sure anyone who provides a service for the Traverse Theatre enters into an agreement with us and meets our standards for data security. They will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. Should you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to the legal ownership of our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International transfers**

Some of our external third parties may be based outside the European Economic Area

(EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

## **6. Data security**

We are committed to protecting the personal information you entrust to us. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, e.g. access to your information is limited to specific staff members who need to use it to supply you with the services you request from us, and our own network is protected through Cyber Security Insurance and two-factor authentication.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six tax years after they cease being customers, for tax purposes. UK tax years run from 6 April to 31 March.

In some circumstances you can ask us to delete your data: see Request erasure of your Personal Data below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **8. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following

scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Legal Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most

secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Updated January 2026