BVP PRIVACY POLICY

INTRODUCTION

The Benvenuto Players (BVP) is committed to the protection of your personal data and to respect your privacy.

This privacy policy on the protection of individuals with regard to the collecting and processing of personal data by BVP is based on the Regulation (EU) 2016/679, commonly known as the GDPR, as implemented by the Decreto Legislativo 196 of 30 June 2003, modified by the Decreto Legislativo 101of 10 August 2018.

This privacy policy explains the reason for the collecting and processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data.

In addition to the needs of BVP with regard to use of its website, WhatsApp groups and Facebook group, your personal data may also be required by some third parties used by BVP as discussed below.

ON WHAT LEGAL GROUND(S) DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data because:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes (GDPR Art. 6.1.a) such as using the contact form on the BVP website;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (GDPR Art. 6.1.b) such as applying for BVP membership or buying a ticket for one of our shows;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (GDPR Art. 6.1.f); examples are BVP receiving information about ticket purchases from its e-ticketing service provider and including, if consented to by the service user, the service user in the BVP mailing list.

As we do not process any special category of personal data, GDPR Art. 9 does not apply.

WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA?

Most of the BVP website is accessible without giving any personal data. However, personal data (including data related to passwords) are required for:

a) completing a membership form;
b) submitting a contact form;
c) accessing the members' area of the BVP website;

Similarly, personal data are required for:

d) inscribing a BVP member in and insuring that member with the Federazione Italiana Teatro Amatori; or another insurance company if deemed necessary.
e) utilising a ticketing e-service for BVP activities using a third party;
f) accessing the BVP groups on WhatsApp that BVP uses primarily for operational purposes;
g) accessing the BVP group on Facebook that BVP uses for publicity purposes.

When personal data are required for d) and e), you can find more detailed information in the specific privacy policy linked to the website of the federation or of the ticketing service provider (the provider is identified on the BVP website).

Similarly, regarding the personal data required for inclusion in BVP WhatsApp and Facebook groups, points f) and g), you can find more detailed information in the specific privacy policies of these social media websites.

WHICH PERSONAL DATA DO WE COLLECT AND FURTHER PROCESS?

The type of personal information that we collect depends on how you are specifically interacting with BVP.

For BVP members, we collect the following categories of personal information:

- Contact information: first name, last name, residential address, email address, telephone number;
- Demographic information: birth place, nationality;
- Other information: date of birth, gender, tax number (codice fiscale);

and, in addition, for minors:

- contact information of the minor's parent / guardian.

During BVP activities, BVP may also collect images (photographs, video, etc) of BVP members which fall within the definition of personal data.

BVP sometimes permits non-members to participate in a BVP activity as a one-off trial before deciding whether or not to submit a membership application. In such instances, explicit consent will be sought before any images of a trial non-member are collected during the activity.

Consent is explicitly sought and registered as part of the BVP membership process with regard to the collection and processing of personal data, including possible future images, of applicants.

For non-members, BVP collects, either directly via the website contact form or indirectly via the ticketing e-service, a subset of the contact information personal data and the IT information.

BVP also collects IT information, either the Internet Protocol (IP) address or the device ID of the device, used to access the BVP website.

The BVP website does not use cookies. However, the BVP website does provide links to third-party sites and to use third party content, you may need to accept their specific terms and conditions, including their cookie policies over which we have no control.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

For BVP Members, your personal data other than your name are stored for as long as is necessary to meet the purposes for which they were collected. We will delete such personal data if they are no longer needed or upon a request emailed to info@thebenvenutoplayers.org unless we have a legal obligation to keep the data. Deletion will entail cancellation of any associated current membership.

For BVP Members, their names are stored indefinitely for historical membership purposes. If not a current BVP member, we will delete a name upon a request emailed to info@thebenvenutoplayers.org.

For persons other than BVP Members, your personal data are stored for as long as is necessary to meet the purposes for which they were collected. We will delete such personal data if they are no longer needed or upon a request emailed to info@thebenvenutoplayers.org.

Notwithstanding the above, you may also have the opportunity to unsubscribe from particular lists (e.g. BVP mailing list) or from the BVP groups on WhatsApp and Facebook. By selecting to unsubscribe we will delete your personal data related to the subscription if they are no longer needed with the exception of any such data that has already been shared within the BVP groups on WhatsApp and Facebook. In such instances, an email to info@thebenvenutoplayers.org is not required.

In the case of non-electronic personal data, deletion is to be taken to mean destruction.

IT information is only kept for as long as technically necessary during, say, a web browsing session.

HOW DO WE PROTECT AND SAFEGUARD YOUR PERSONAL DATA?

All electronic personal data collected by BVP are stored in computer files that have restricted access. Likewise, all non-electronic personal data collected by BVP are stored in locations with restricted access.

WHO HAS ACCESS TO YOUR PERSONAL DATA AND TO WHOM ARE THEY DISCLOSED?

For the personal data of BVP members, only the President and the Membership Secretary has access to all of the data. Appropriate extracts of this data are made available on a need-to-know basis to specific BVP members having an official BVP function pertaining to BVP members.

For the personal data of persons other than BVP members, such data are accessible to specific BVP members having an official BVP function pertaining to non-members. In the case of personal data provided via the contact form of the BVP website, such data may be made available to a specific BVP member having an official BVP need pertaining to the submitted contents of the contact form.

YOUR RIGHTS AS A DATA SUBJECT

You have the right to obtain access to the personal data held by BVP about you and to request its rectification or erasure, or restriction of processing or, where applicable, the right to object to processing or the right to data portability. Where the processing is based on your consent or explicit consent, you also have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Any request concerning the processing of your personal data should be emailed to pr@thebenvenutoplayers.org.

DATA CONTROLLER

For the purpose of the GDPR, the Data Controller is The Benvenuto Players with its legal headquarters as specified in Article 2 of the Constitution

CHANGES TO THE PRIVACY POLICY

A minimum of two weeks' notice will be given of upcoming changes to the privacy policy that are either individually substantive or material in nature or which collectively constitute an important update to the policy. A notification will be announced on the BVP website and emailed to each BVP member and to each person on the BVP mailing list.

Less significant changes to the privacy policy will be simply announced on the BVP website and the revised privacy policy will be immediately applicable.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be emailed to pr@thebenvenutoplayers.org.