

# Sheffield Doc | Fest

## Privacy Notice

Written by Head of HR & Participation

June 2020

### Introduction

Sheffield Doc/Fest 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 collected when you visit our website (regardless of where you visit it from) or have otherwise provided personal data to us offline in the course of our dealings with you. It will also tell you about your privacy rights and how the law protects you.

### Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through your use of our website including any data you may provide through our website when you sign up to our e-newsletter, purchase a festival pass or event ticket or when we take your details (collect your personal data) offline, or through third-party software in order to process requests to buy passes to our festivals, be a pass holder at our events, submit content to us or have some other form of engagement with us.

This website is not intended for children and we do not knowingly collect data relating to children. Either through this website or any third party website, that we may use in connection with the sale of our festival passes, tickets or the entry by you of film projects or art content.

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.

We maintain a separate privacy notice in relation to the personal data we collect and process in relation to those who work with us, whether as employee or contractor and this is provided to those individuals at particular points of our engagement process. If you are such an individual and are looking for another copy of such notice, please contact your line or HR Manager or contact [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com)

## **Controller**

International Documentary Festival Sheffield (Sheffield Doc/Fest) is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice).

## **Contact details**

Our full details are:

### **Full name of legal entity:**

International Documentary Festival Sheffield (Sheffield Doc/Fest)

**Charity Number:** 1184849

**Email address:** [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com)

**Postal address:** The Workstation, 15 Paternoster Row, Sheffield, South Yorkshire, UK, S1 2BX

**Telephone number:** +44 (0)114 276 5141

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**

This is our fifth Privacy Notice to be issued following the launch of the General Data Protection Regulations. We may update this Privacy Notice from time to time and details of our archived Notices will be listed [here](#).

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**

Our 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 their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **What data we collect and how we process it**

### **1. The data 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 may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, 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.
- **Photo ID** is a photo which we require in order to issue festival passes and to ensure the events run smoothly and without incident. These are stored by us and are used by us only for the purposes of printing any festival passes and for security reasons in the event of an incident. They are deleted 6 months after the end of the relevant festival.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Attendance preferences** include pass holder preselection in relation to various events taking place within and during the festival.
- **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 our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving newsletters from us and potentially, if you so indicate your consent, from our third parties as well as your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. 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.

Other than in relation to the **Diversity Information** (as described below), we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### ***Diversity Information***

Doc/Fest Sheffield believes that it is vitally important that our festival not only appeals to the widest audience but that the films and content that we promote is from a diverse a

background as possible. We do therefore carry out diversity and equality surveys in relation to:

1. Those that register to attend our festivals or view our programme digitally;
2. Those that submit content to us for possible inclusion in our festivals.

As part of the entry process for content at our festivals, we will ask for information to ensure equal representation in our programming. This may include information as to your racial origins, any disability and sexual orientation. You are not obligated to provide such information and can choose not to provide a response to any individual question.

While we collect this information from you at the time an entry is made, it is only used by us for the purposes of assessing the diversity of our content. If you are unsuccessful, then we will retain your responses but delete the association with your name and any other data which could identify you personally.

If you are successful we will retain this data as part of the data we hold on you. We will not provide this information to any other parties, which will only be available to those who are responsible for managing our content.

While we do collect diversity and equality information from those registering, the responses do not identify any named respondent and so, therefore, are not considered personal data.

### **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 goods or services). 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.

## **2. 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, Marketing Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes the personal data you provide when you:

- apply for our festival passes or tickets;
- create an account on our website or with us directly;
- subscribe to our electronic newsletter;
- request marketing communication or merchandise to be sent to you;
- submit a Film, Alternate Realities project, Talks & Session idea, Meetmarket or Alternate Realities Market project to us; 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. Please see our cookie policy, for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU;

Contact Data, Identity Data from the following parties:

- (b) **Cinando.** Doc/Player – online film library. Users upload their personal data directly to the third party, not via our website. The Data is collected will be email, name, company name, address, job title, occupation, phone number and it is based in Paris France.
- (c) **Shift72** - Doc/Selects - online film library. Users upload their personal data directly to the third party, not via our website. The Data collected will be email, name, address, phone number, date of birth, card details and the platform is based in New Zealand. <https://www.shift72.com/privacy-policy>
- (d) **Eventival** – used for Film, Alternate Realities and Marketplace entries, who collect personal data when content is submitted by users. They are based in Prague, Czechia. <https://www.eventival.com/en/privacy-policy>

### 3. How we use your personal data

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 such as to allow us to process and issue your tickets for festival or single event admission and to administer the events which you are attending.
- 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. Sheffield Doc/Fest is an enjoyable film festival but also a networking event for our sponsors, our pass holders and our attendees. We have assessed that it is within our legitimate interest in running the festival that basic details of those attending the events and/or participating in the online programme are shared across the different groups of those attending and those of our sponsors. Any details of pass holders are normally limited to name, business name and sometimes postcode. In providing such details we are only permitting awareness for the purposes of networking opportunities at the event and not for ongoing communication and marketing. Details of our current sponsors for 2020 are listed in the Schedule to this Privacy Notice below.
- Where we need to comply with a **legal or regulatory obligation**.

**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.

Generally, we 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 or text message. You have the right to withdraw consent to marketing at any time by contacting us on [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com).

#### **4. Development and Fundraising**

Sheffield Doc/Fest is a registered charity and welcomes voluntary contributions and donations from our audiences and partners.

Informing you of charitable activity we deliver including products, services or events related to Sheffield Doc/Fest, such as exhibitions, films, education events and community projects. Information on our fundraising operations, including occasional targeted requests to consider supporting us in various ways. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. If you wish to exercise any of your rights, as listed below please write to us at [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com).

#### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing, advertising, development and fundraising. If you wish to change these at any time please email **OR** the following personal data control mechanisms are in place:

#### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside Sheffield Doc/Fest for marketing purposes. The only parties that we would ever provide your information to are the partners who support our activity. Our current list of partners is set out in the Schedule below. However, if we are to provide your information for the purposes of allowing them to send you marketing or other communications we will obtain your consent first.

## Opting out

You can ask us or third parties to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or] by contacting us at [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com) at any time].

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, product/service experience or other transactions].

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

## 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com).

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 outlined in paragraph 3 above.

- Third-party providers such as those tools we use for scheduling attendees at individual events at the Festival.
- Specific third parties listed in the table below:

Third-Party Who affected	Who affected	Reason for sharing and lawfulness of sharing
Hotels and transportation companies	Industry pass holders to whom we are offering hotel accommodation or transportation	So that we can properly provide such accommodation or transportation. We will notify you of this when we discuss such arrangements with you Legitimate interest

Certain Sponsors	All festival pass holders	Our sponsors are typically from within the industry and on occasion, certain of our sponsors will seek to understand the nature and backgrounds of our attendees. In certain situations, we may be required as part of our sponsor arrangement with that partner to provide basic details of attendees to them. They are not provided with this information so that they can communicate directly with you. Legitimate interest If, as a festival pass holder, you would like your name to be removed from any such list please contact us on <a href="mailto:privacy@sheffdocfest.com">privacy@sheffdocfest.com</a>
Market Analysis - AudienceView	All festival pass holders	This data processor is merely allowing us to analyse the source and location of our attendees. Legitimate Interest

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 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.

## 6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

## 7. Data security

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. 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.

## 8. 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us on [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com).

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.

## 9. Your legal rights

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

You have the right to:

**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 on [privacy@sheffdocfest.com](mailto:privacy@sheffdocfest.com).

### **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.

## SCHEDULE

### FUNDERS, SPONSORS AND PARTNERS 2020

<p><b>PRINCIPAL FUNDERS, SPONSORS &amp; PARTNERS</b></p> <ul style="list-style-type: none"><li>○ BFI</li><li>○ Sheffield City Council</li><li>○ Marketing Sheffield</li><li>○ Arts Council England</li><li>○ Wellcome</li><li>○ Site Gallery</li></ul> <ul style="list-style-type: none"><li>○ Channel 4</li><li>○ BBC</li><li>○ ITV</li></ul>	<p><b>MAJOR FUNDERS &amp; SPONSORS</b></p> <ul style="list-style-type: none"><li>○ Bertha Foundation</li></ul>
<p><b>SPONSORS &amp; PARTNERS</b></p> <ul style="list-style-type: none"><li>○ Netflix</li><li>○ Sheffield Hallam University</li><li>○ University of Sheffield</li><li>○ Department for International Trade</li><li>○ The Whickers</li><li>○ Getty Images</li></ul> <ul style="list-style-type: none"><li>○ Scottish Documentary Institute/Creative Scotland</li><li>○ Screen Ireland</li><li>○ Channel 5</li><li>○ Chicken &amp; Egg Pictures</li><li>○ Chile Doc</li><li>○ Second Home</li><li>○ BAFTA</li><li>○ Creative England</li></ul>	<p><b>FILM PROGRAMME</b></p> <ul style="list-style-type: none"><li>○ BFI Player</li><li>○ Doc Alliance</li><li>○ The Guardian</li><li>○ MUBI</li></ul> <p><b>MEDIA PARTNERS</b></p> <ul style="list-style-type: none"><li>○ Broadcast</li><li>○ Business Doc Europe</li><li>○ Realscreen</li><li>○ Documentary Weekly</li><li>○ Screen International</li></ul>

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| <ul style="list-style-type: none"><li>○ British Council</li><li>○ Film Lab Palestine</li><li>○ Doc Society</li><li>○ Grierson Trust</li><li>○ Church Burgesses Trust</li><li>○ Bertha DocHouse</li></ul> |  |
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