



DATA PROTECTION POLICY AND PRIVACY STATEMENT

New Generation Festival Limited is committed to protecting and respecting your personal data. The data that we gather and hold is managed in accordance with the General Data Protection Regulation (GDPR) 2018. This privacy policy explains how we use any personal information that we collect about you when you engage with any of our activities or services, with effect from 25 May 2018:

1. Who We Are

1.1 The New Generation Festival (the 'Festival') is an opera, theatre and music festival staged in Florence, Italy, operated by New Generation Festival Limited (the 'Company'), which is incorporated in the United Kingdom. The Festival has been established to promote the new generation of up-and-coming musical, artistic and performing talents from across the world, the stars of tomorrow, and to inspire a new generation of audiences.

2. How You Can Contact Us

2.1 All general enquiries can be sent to info@newgenerationfestival.org.

2.2 The Company's Data Protection Officer is Frankie Parham, who can be contacted at the following e-mail address: fcf@newgenerationfestival.org.

3. The Data We Collect and How We Use It

Below are outlined the different ways in which we collect and process data from people engaging across our activities and services. Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights.

3.1 Our customers (including our members and sponsors):

3.1.1 We collect information that you provide when you request our services, such as your name, telephone number, postal address and e-mail address. We will only process your data in the following ways where you have given us explicit consent to do so by agreeing to the terms of this privacy notice. The information that you provide forms a 'person record' that is stored securely on our computer system.

3.1.2 We use this information to:

3.1.2.1 Manage the services provided by the Company to you; and

3.1.2.2 Contact you using the telephone number, e-mail and/or postal addresses you provided.

We will retain this information for up to 10 years following the end of your engagement of the Company in case further service provision opportunities arise in the future.

3.2 Our service providers (including singers, performers, stage crew, caterers and PR firms):

3.2.1 We collect information that you provide when you apply to work as a contractor for the Company, such as your name, date of birth, nationality, telephone number, postal address, e-mail address, bank details and, if applicable, scans of photo identification and/or educational qualification certificates, criminal record check certificates, curricula vitae, interview notes and references. We will only process your data in the following ways where you have given us explicit consent to do so by agreeing to the terms of this privacy notice. The information that you provide forms a 'person record' that is stored securely on our computer system.

3.2.2 We use this information to:

3.2.2.1 Manage the services provided by you to the Company and/or the Company's customers;

3.2.2.2 Contact you using the telephone number, e-mail and/or postal addresses you provided;

3.2.2.3 Ensure that you are capable of providing the relevant services; and

3.2.2.4 Pay for your services using the bank details you provided.

We will retain this information for up to 10 years following the end of your engagement by the Company in case further service provision opportunities arise in the future.

3.2.3 We may collect equal opportunities data (*e.g.*, your nationality, gender and your ethnicity) that you provide optionally when you apply to take part in our activities. We use this data in an anonymised form for the following purposes:

- 3.2.3.1 To analyse the demographics of contractors whom we engage in order to improve how we market our opportunities and to increase the accessibility of our activities; and/or
- 3.2.3.2 In our business reports and proposals, to share our progress towards accessibility targets.

We will never process this data in a way that allows you to be personally identified.

- 3.2.4 If you are unsuccessful following assessment for the role you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of 5 years. If you say yes, we would proactively contact you should any further suitable opportunities arise.
 - 3.2.5 If you are successful, the information you provide during the application process will be retained by us for the duration of your engagement plus 10 years following the end of your engagement.
- 3.3 Our agents and other third-party affiliations (including journalists):

3.3.1 We collect information that you provide when you apply to work as an agent for the Company, such as your name, telephone number, postal address and e-mail address. We will only process your data in the following ways where you have given us explicit consent to do so by agreeing to the terms of this privacy notice. The information that you provide forms a 'person record' that is stored securely on our computer system.

3.3.2 We use this information to:

- 3.3.2.1 Manage the services provided by you to the Company and/or the Company's customers; and
- 3.3.2.2 Contact you using the telephone number, postal and/or e-mail addresses you provided.

3.4 Recipients of our newsletters and other circulars:

3.4.1 We collect your name and e-mail address for the following purposes:

- 3.4.1.1 To provide you with information about the Company's activities (*e.g.*, a newsletter); and
- 3.4.1.2 To contact you about other relevant activities.

3.4.2 We use a third-party provider, Mailchimp, to deliver our newsletters. We gather statistics around e-mail opening and clicks using industry standard technologies, to help us monitor and improve our newsletter. For more information, please see [Mailchimp's privacy notice](#).

3.5 Visitors to our website:

3.5.1 Those who visit our website are, in so doing, agreeing to be bound by the terms of this privacy notice.

3.5.2 We may collect log data about you whenever you visit our website. We will only use this data in order to troubleshoot problems with your use of the website (for example, if a form will not load) and never to do any individual profiling of you for marketing purposes. The information that we may collect includes: originating IP addresses, internet service providers, the files viewed on our site (*e.g.*, HTML pages, graphics, *etc.*), operating system versions, device type and timestamps.

3.5.3 We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this in order to:

3.5.3.1 Find out things such as the number of visitors to the various parts of our website; and

3.5.3.2 Make improvements to the ways in which we market our opportunities and how people interact with our website.

This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

3.6 Cookies:

3.6.1 We use third-party tracking services that employ cookies and page tags (also known as web beacons) to collect data about visitors to our website. This data includes usage and user statistics.

3.7 People who email us:

3.7.1 To encrypt and protect e-mail traffic, we use Transport Layer Security (TLS) by default, but when a secure connection isn't available (both sender and recipient need to use TLS to create a secure connection), messages will be delivered over non-secure connections. If your e-mail service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

3.7.2 We will also monitor any e-mails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any e-mail you send is within the bounds of the law.

3.8 Our employees:

3.8.1 We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for employment. You do not have to provide what we ask for but it might affect your application if you do not. Information that we collect might include:

- 3.8.1.1 Your personal details including name and contact details;
- 3.8.1.2 Your previous experience, education, referees and answers to questions relevant to the role you have applied for;
- 3.8.1.3 Written tests or interview notes generated at assessment or interview days;
- 3.8.1.4 Pre-employment checks (such as proof of your identity and your right to work in the relevant jurisdiction);
- 3.8.1.5 A standard or enhanced Criminal Record check via the Disclosure and Barring Service;
- 3.8.1.6 A questionnaire about your health. This is to establish your fitness to work and to ensure that we can provide any support or reasonable adjustments required by you;
- 3.8.1.7 Bank details to process salary payments; and
- 3.8.1.8 Emergency contact details so that we know who to contact in case you have an emergency at work.

We might also contact your referees, using the details you provide in your application, directly to obtain references.

3.8.2 If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of 5 years. If you say yes, we would proactively contact you should any further suitable vacancies arise.

3.8.3 If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 10 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

4. How We Share and Transfer Your Personal Data to Other Organisations

4.1 We will never sell, rent, or trade your personal data. We may disclose your data to service providers who render services to us or on your behalf (*e.g.*, Mailchimp and Google, amongst others), all of which are obliged to operate in accordance with applicable laws, including GDPR.

4.2 We also may disclose your information if required by law or to enforce our legal rights.

- 4.3 Some of our service providers lie outside of the EEA (*e.g.*, Mailchimp and Google). Therefore, sometimes we transfer your data outside of the EEA. If we do, we ensure your data is processed only in countries that provide an adequate level of protection for your data or where the recipient provides appropriate safeguards, such as mechanisms like the EU-US Privacy Shield Framework.
- 4.4 You can read more about how our service providers comply with GDPR here: [Mailchimp](#) and [Google](#).

5. What Your Rights Are

- 5.1 You are not required to provide any personal data to us. However, your failure to do so may affect our ability to provide you with the services, engagement or employment, as applicable, that you request. For example, we are unable to contact you with information about an activity if you do not provide your e-mail address.
- 5.2 We respect your privacy rights and provide you with reasonable access to the personal data that you may have provided us. If you wish to access or amend any personal data we hold about you, or to request that we delete any information about you, you may contact us at: info@newgenerationfestival.org.
- 5.3 Please note that while any changes you request will be reflected in our databases immediately or within a reasonable time period, we may retain all information you submit for back-ups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.
- 5.4 At any time, you may object to the processing of your personal data by contacting the above e-mail address, on legitimate grounds, except if otherwise permitted by applicable law.
- 5.5 If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact Frankie Parham, the Company's Data Protection Officer, at fcp@newgenerationfestival.org. You also have a right to lodge a complaint with data protection authorities.

6. How We Retain Your Personal Data and Keep It Secure

- 6.1 Internally, your data is shared between members of the Company's management team responsible for delivering the services you have requested and/or the activities with which you are involved. Your data may also be shared with individuals selected as interns on temporary work placements who will be asked to sign non-disclosure agreements. Data is only shared with

individuals who require access in order to provide the services or activities to which you have signed up.

- 6.2 We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity. Please see section 3 above for more information on how long we hold your information for.
- 6.3 We use reasonable organisational, technical and administrative measures to keep any information collected and/or transmitted to us secure. This includes the use of HTTPS with TLS (Transport Layer Security), which encrypts transmitted data, however, no data transmission or storage system can be guaranteed to be 100% secure.

7. How Often This Policy Is Reviewed and Updated

- 7.1 We keep our data protection policy under regular review and we will place any updates on our website, as applicable. This privacy policy was last updated on 25/05/2018.