

OYAP Trust

Customer Information Security Policy

(Payment Card Industry Data Security Standard compliance)

1. Statement of Policy

OYAP Trust is committed to safeguarding the privacy of our customer data. Our customers include children and young people, participants, supporters, artists and other visitors. This policy is intended to ensure that customers feel confident about the privacy and security of personal information given to us and outlines the security measures we use to prevent any unauthorised access to personal information.

For the purposes of this policy '*personal information*' means all information that identifies, or is capable of identifying, any customer as an individual. We may collect and use data about customers as when booking on to our projects, when making a donation, or with respect to other forms of charitable giving.

All personal information is stored in compliance with OYAP's Data Protection Policy and, for retail transactions, in accordance with the requirements of the Security Standards Council's regulations for the Payment Cards Industry.

** In this Policy 'cardholder' is used to refer to all card types, e.g. debit and credit cards.*

2. Information for Customers

What personal information do we collect?

If you book for activities, whether paid or free, OYAP will ask for your name, geographical address including post code and contact details (email address and/or telephone number).

For paid activities where payment is made by card we will also need your credit card number and security checking data as required by the card company.

If you join our mailing list we will record your name and email along with other information you supply to help us make our marketing campaigns more effective.

If you agree to support OYAP the details will vary according to the amount and type of transaction. This could include any or all of the above.

How will this information be used?

Your personal information will be used to provide the service you requested; this may include any or all of the following:

- Book a ticket for a performance or place on a project.
- Process a transaction for activities or services.
- Provide information about activities or services.
- Keep you informed about what's happening at OYAP.

Personal information is not passed on to third parties without clear prior agreement.

How long do we keep this data?

The time period for which we keep information varies according to the reason for which it was provided. We will not retain personal information when it is no longer required.

For all card payment transactions, personal information relating to the cardholder will be destroyed as soon as the transaction is complete, except where there are legal requirements to keep data for a minimum period.

For marketing and information purposes we will retain information for as long you wish to receive this material. You can unsubscribe at any time.

For supporters and other forms of donation information will be stored until support is withdrawn.

If you wish for your data to be removed from our records, you no longer wish to receive marketing information, or you want to update your details please contact us as follows:

Email: admin@oyap.org.uk
Telephone: 01869 602560

3. Management of Personal Information

3.1 Processing retail transactions

During face-to-face transactions no personal cardholder information is recorded. Cardholder details are processed via a hand held terminal that requires the customer to enter their own security data. On completion of the transaction the customer data is not visible to OYAP.

For occasional ticketed events we use an online ticketing provider where the customer is responsible for entering their own personal information.

OYAP does not take card payments by phone and uses a payment provider which does not accept manually keyed in card details. We never store a written copy of cardholder information.

All staff are trained in the importance of this policy, its impact on their role, and how to dispose of recorded material securely.

3.2 Storage of credit card transaction data

Our system is electronic and OYAP retains no paper receipts with cardholder data.

Access to electronic material is granted to staff only on a need to know basis.

3.3 Storage of booking information

Personal information given in order to book on to activities at OYAP is stored electronically within our customer database. For project participants we also keep medical or other relevant details, along with contact numbers for use in the event of an emergency.

Selected non-personal data may be used for marketing purposes, for example to identify the age or geographic spread of participants.

If a customer wishes to see a copy of the data held on them, or would like to have their details removed they can contact us. We aim to respond within 4 weeks of receipt of the request.

3.4 Storage of supporter details

Electronic information is accessible via password protected login at workstations. Access to this information is only granted to staff who need to know for the purpose of their job.

All staff who work with supporters are fully trained in the importance of this policy, its impact on their role, and how to store and dispose of personal information securely.

3.5 Lapses in internal security measures

All staff who work with personal information are encouraged to be alert to, and report, possible lapses in these security procedures.

In the event of personal information being lost or accessed by unauthorised personnel the following actions will be taken:

- Investigate the omissions or oversights that led to information security being compromised.
- Reassess procedures and make revisions to the systems and policy to prevent a similar occurrence.
- If appropriate, advise customers / supporters to take appropriate action to prevent the possible use of their data.

4. Review of policy and changes to risk

An assessment of the severity of risk will be made annually or whenever our use and storage of personal information changes. This policy will be reviewed and updated to reflect this process.

*Reviewed and revised March 2020
Adopted by the Board on 05/06/2020*