

Pegasus Opera Company Confidentiality and Data Protection Policy

Pegasus Opera Company stores and processes personal information; usually in relation to staff, trustees, job applicants, performers, volunteers and beneficiaries. The Data Protection legislation requires every data controller (e.g. employer) who processes personal information to register with the Information Commissioner's Office (ICO). The Executive Director is the Data Protection Officer (DPO) for Pegasus Opera Company.

Confidential information is all information, which we identify or treat as confidential or which, because of its character or the manner of its disclosure, is evidently confidential and includes:

- (a) information regarding the terms on which individuals are employed or engaged by us and details of the terms on which the contracts of any such individuals are terminated;
- (b) our marketing and business plans;
- (c) details of planned future performances and programmes of Pegasus Opera Company (prior to the agreed publication of these);
- (d) details of our budgets, management accounts, bank accounts, ticket sales, subsidies and grants, and other confidential financial information;
- (e) information which we are bound by an obligation of confidence owed to a third party;
- (f) details of litigation involving us whether proposed, in progress or settled and disputes within Pegasus Opera Company;
- (g) personal details about our trustees.

We will not publish or cause or encourage to be published in any medium whatsoever (and in particular to the press or broadcast media) any statements concerning our business or affairs, or those of any of our officers, trustees, employees or contractors, without the written permission of the Pegasus Opera Company Executive Director. Any queries received from the press or broadcast media should be referred to our Producer.

Key Definitions

Personal data comprises information which relates to a living individual who can be identified from that information or from other information which is available to us. All data held on computer is covered by the Data Protection legislation but paper filing systems are only covered when the files are arranged in a way that allows information on individuals to be readily accessible (such as a set of A-Z files on employees).

Artistic Director Alison Buchanan	Executive Director Sonia Hyams	Registered VAT No: 707 0999 15 Registered Company No: 03294827 Registered Charity No: 1052704
Patrons: Dame Kiri Te Kanawa Kristin Lewis Chuka Umunna MP	Roderick Williams OBE Sharon D Clarke MBE Dame Lawrence of Clarendon	

Sensitive personal data is personal data about a data subject’s racial or ethnic origin; political opinions; religious beliefs or beliefs of a similar nature; trade union membership; physical or mental health or condition; sexual life; commission or alleged commission of any offence and information about any associated proceedings.

A **data controller** is an organisation or person that determines the purposes for which and the manner in which personal data are processed. In this case, it is Pegasus Opera Company.

A **data subject** is an individual about whom data are held. For example, an employee, an opera mentee, community choir member or audience member would be a data subject.

A **data protection officer** is the person or persons responsible for ensuring that the Pegasus Opera Company complies with all provisions of the Data Protection legislation.

Process covers any action that can be done with data. This includes obtaining, recording, holding, organising, adapting, altering, retrieving, consulting, using, transferring, disclosing, aligning, combining, transcribing, printing, filing, sorting, blocking, erasing or destroying data.

Data Protection

In order to keep and maintain records relating to employment at or contractual agreements with Pegasus Opera Company, it is necessary for us to record, keep and process personal data relating to employees and some contractors both on computer and in hard copy form. To the extent that it is reasonably necessary in connection with your employment or contractual agreement this data may be disclosed to others, including employees of ours, affiliate companies, our professional advisers, HMRC or any other taxation authority, the police and other regulatory authorities. Pegasus will hereby gain the consent from employees or contractors for the recording, processing, use and disclosure by us of personal data relating to employees or contractors as set out above (which may include your sensitive personal data to the extent required by reason of employment at Pegasus Opera Company or by law).

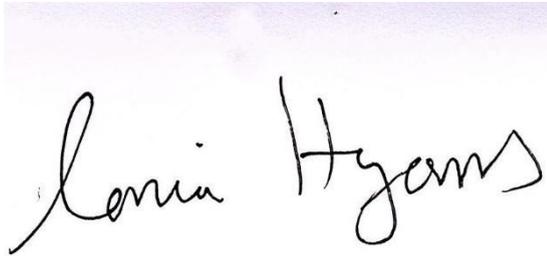
Data will be retained and reviewed on an annual basis whereby the DPO will either retain for the following year or destroy/remove if that data is no longer required. The Pegasus DPO has access to all personal data kept on a secure password protected drive or under lock and key as hard copies in the Pegasus office.

Every care is taken to ensure that this personal data is held in confidence and secrecy. Employees have the right to inspect, review and, if necessary, update your personal details on an annual basis. If personal circumstances do change at any time then employees should inform Pegasus Opera Company accordingly. This will ensure that the information remains accurate.

If there is a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, then in the first instance this must be reported to the Pegasus DPO who will record this breach. If the breach is deemed serious enough, the matter will be referred to the Information Commissioners Office (ICO).

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The Pegasus Data Protection Policy is consistent with our Privacy Notice, which will be communicated to all those whose personal data you collect and process. A full copy of our Privacy Policy can be found at the bottom of our website.



Sonia Hyams, Executive Director
Document last reviewed August 2021

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