

## Birmingham Ceremonies Limited Privacy Notice

Birmingham Ceremonies Limited (“we”, “us”, “our”) is committed to protecting and respecting your privacy.

Under data protection laws, we are the ‘data controller’ of your personal information. This means we are responsible for deciding what information to collect about you and how it is used.

This notice explains what personal information we collect about you, how and why we use it, who we disclose it to, and how we protect it. It also tells you about your rights. It applies to you if you:-

- 1) [use our website, subscribe to any notifications or contact us with an enquiry through our website or by email;](#)
- 2) [apply for employment positions with us;](#)
- 3) [apply for roles directly with us as a volunteer or otherwise apply to be part of the Birmingham 2022 Opening and/or Closing Ceremony as member of the cast \(“Ceremonies Volunteers”\); or](#)
- 4) [apply for volunteer roles via the Birmingham Organising Committee For The 2022 Commonwealth Games Limited \(“Production Volunteers”\)](#)

### **What is personal information**

Personal information broadly means any information about a living individual who can be identified from that information directly, or indirectly (for example if it is combined with other available information).

### **1. What personal information do we collect?**

The information that we collect about you depends upon the nature of your engagement with us.

#### **Visitors to our website**

We may use analytical tools to collect information about how visitors use our website. This information won’t be used to identify you unless you submit your contact details via the website, where we may then connect your prior activity on our website with your personal information.

#### **Individuals who use our services or contact us with an enquiry**

We will collect the information you submit via our website or when you contact us, for example your name, contact details, details about the service you’re interested in or your enquiry.

#### **Individuals who apply for employment within our organisation**

We will collect the information you submit as party of your application, for example name, gender, home address and telephone number, date of birth, residency, nationality and work permit status, passport information, information relating to your application to the company, such as interview notes and test results, information contained within your CV, equal opportunities and diversity information including information about disabilities, ethnic origin, religion and sexual orientation, information about criminal

convictions, and information we collect to comply with our statutory requirements such as ID for anti-money laundering checks, or to comply with the requests and directions of regulatory bodies and law enforcement bodies or court orders.

**Individuals who apply for Ceremonies Volunteer roles directly with Birmingham Ceremonies Limited or otherwise apply to be part of the Birmingham 2022 Opening and/or Closing Ceremony as member of the cast (“Ceremonies Volunteers”)**

We will collect the following personal data in order to administer an applicant’s application for any Ceremonies Volunteer role:

- "Identity Data" includes first name, maiden name, last name, previous name, preferred name, title, date of birth, age, gender, country/city of birth, nationality, Identification Document (document type, number, date of issue and expiry, issuing country and photograph),
- “Image Data” photographs, video footage;
- "Profile Data" includes your application log in username and password, your email address, your volunteering location preference, volunteering area preference;
- “Health and Accessibility Data”: includes accessibility and medical information and requirements (including if a chaperone, carer, guide, or assistance dog is required), dietary requirements;
- "Contact Data": includes residential address, delivery address, email address, and telephone numbers, emergency contact information (if you provide us with information about other individuals (e.g. your next of kin), you confirm that you have informed the relevant individuals accordingly.);
- “Skills and Experience Data”: includes skills and experience, general skills and experience, medical and first aid qualifications, professional membership and registration details, qualification certificates and language skills;
- “Uniform and Costume Sizing Data”: includes shirt size, trouser size, height, gender;
- “EDI Data” includes accessibility and disability information, sexual orientation and racial or ethnic origin; and
- “Marketing and Communications Data” includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Individuals who apply for volunteer roles through Birmingham Organising Committee For The 2022 Commonwealth Games Limited (“OC”) (“Production Volunteers”)**

The OC will pass us the following information, and we will act in the capacity of data controller in respect of such information, in order to administer your involvement with us as a Production Volunteer:

- "Identity Data" includes first name, maiden name, last name, previous name, preferred name, title, date of birth, age, gender, country/city of birth, nationality, Identification Document (document type, number, date of issue and expiry, issuing country and photograph),
- “Image Data” including photographs;
- "Profile Data" including your volunteering location preference, volunteering area preference;
- “Health and Accessibility Data”: includes accessibility and medical information and requirements (including if a chaperone, carer, guide, or assistance dog is required), dietary requirements;
- "Contact Data": includes residential address, delivery address, email address, and telephone numbers, emergency contact information (if you provide us with information about other individuals (e.g. your next of kin), you confirm that you have informed the relevant individuals accordingly.);
- “Skills and Experience Data”: includes skills and experience, general skills and experience, medical and first aid qualifications, professional membership and registration details, qualification certificates and language skills;
- “Uniform and Costume Sizing Data”: includes shirt size, trouser size, height, gender.

We will always try to keep the amount of personal information we collect to the minimum needed and delete any category of data where it is no longer required.

**2. Using your personal information**

We use your personal information for the following purposes:

- Providing website features. We'll use information we collect to help ensure that content from our site is presented in the most effective manner for you and for your computer, allow you to participate in interactive features of our websites, and monitor how our websites are used, in order to improve them.
- Providing our services or responding to your enquiry. We'll use your information to provide the service you've requested. For example, to process your registration for an event, so that we can contact you about the event you have registered for, or to send you a link to, or copy of the publication that you've requested. If you send us a general enquiry, we'll forward it to the relevant department who will use your information to respond to you about your enquiry. We may also contact you by post or phone, unless you ask us not to.
- Identification checks (clients, prospective clients and related persons). We are obliged to verify the identity of prospective and (in some circumstances) existing clients. This involves checking the identity and good standing of clients and related persons. We may use third-party software to perform checks and carry out risk scoring.
- Where you have applied for a job or volunteer position with us, we hold your personal information because we need it to process your application for the role you have applied for, as well as be able to report and monitor the progress of candidates through each stage of recruitment. Further, if you opt in to receive job alerts, we will send you targeted email communications, including job alerts. Links in the emails may redirect you to our websites including [www.birminghamceremonies.com](http://www.birminghamceremonies.com).

**Ceremonies Volunteer Data**

Where you have applied for a Ceremonies Volunteer role with us, we will use your personal information for the following purposes:

<b>Type of Data</b>	<b>Purpose</b>	<b>Lawful basis for processing</b>
Contact and Identity Data	For communicating with you about your volunteer application, possible interview and if successful, your allocated volunteering shifts and location, for the delivery of your volunteer uniform and for accreditation purposes	Legitimate Interests: we need to process this personal data to be able to communicate with you throughout the Ceremonies Volunteer process and for accreditation purposes.
Image Data – specifically photographs	For filming and photographing our events and for accreditation	Volunteer Pledge – it is necessary for compliance with the Ceremonies Volunteer

<p>and filming</p>	<p>purposes.</p>	<p>Pledge that you have acknowledged to comply with;</p> <p>Otherwise Legitimate Interests: we need the ability to publish, display, sell and distribute photos and video footage of our events by means of film, television, radio, print media, internet (digital channels, social media and internet publications publicity material) or any other media now or in the future) in the conduct of the Birmingham 2022 Commonwealth Games and for any promotional purposes connected with the application or our business as agreed with you.</p>
<p>Profile Data</p>	<p>For account/application queries, and to allow you access to your account.</p> <p>To try to provide you with the relevant volunteer role in your preferred area and location.</p>	<p>Legitimate Interests: we need the ability to provide you with account/application support and to allocate you a suitable volunteer role.</p>
<p>Health and Accessibility Data</p>	<p>To ensure we treat everyone equally and fairly and support your needs.</p>	<p>Equality of opportunity and treatment for reasons of substantial public interest;</p> <p>Made public by you: you may provide us with information about specific requirements we need to consider for which you tell us about your health, mental or physical conditions. When you provide us with this information we consider that you are making this information manifestly public to our organisation and we will use this information on this basis, but only for the purposes of supporting your needs.</p>

<p>Skills and Experience Data</p>	<p>To allow you to provide your specific skills or experience at our events, to ensure that you are adequately qualified for specialist volunteer roles and to ensure that we have the requisite number of medical professionals at the ceremonies.</p>	<p>Legitimate Interests: we need to process this personal data to facilitate the provision of your skills and experience at the ceremonies;</p> <p>Necessary to comply with a legal or regulatory obligations (including for health and safety and insurance purposes) for statutory or government purposes or to exercise a protective function for reasons of substantial public interest.</p>
<p>Uniform and Costume Sizing Data</p>	<p>To provide the relevant data to our uniform or costume supplier (see below) to enable the uniform or costume supplier to order the correct amount of material to manufacture the uniforms or costumes and consequently manufacture the uniforms or costumes.</p>	<p>Legitimate Interests: we need the ability to collect and share this data with our uniform or costume supplier in order to provide volunteer uniforms or costumes to successful applicants.</p>
<p>EDI Data</p>	<p>To ensure our volunteer application pool is diverse and representative of the West Midlands we will use the relevant data to encourage and enthuse any underrepresented demographic to apply to be a Ceremonies Volunteer</p> <p>We will look at this data in the round to help us understand the overall picture and to promote diversity and inclusion. This data will not at any point form any part of the selection criteria against individuals.</p> <p>Where you are a member of the case, we may also use this data in order to ensure that we are able to meet your needs.</p>	<p>Equality of opportunity and treatment for reasons of substantial public interest.</p>
<p>Marketing and Communications Data</p>	<p>To deliver relevant marketing communications to you.</p>	<p>Explicit consent via use of a 'tick box'</p>

**Production Volunteer Data**

Where you have applied for a Production Volunteer role via the OC, and the OC passes this personal information to us, we will act in the capacity of data controller and will use your personal information for the following purposes:

<b>Type of Data</b>	<b>Purpose</b>	<b>Lawful basis for processing</b>
Contact and Identity Data	For communicating with you about your volunteer application, possible interview and if successful, your allocated volunteering shifts and location, and for the delivery of your volunteer costumer or uniform.	Legitimate Interests: we need to process this personal data to be able to communicate with you throughout the Production Volunteer journey and for accreditation verification checks and the production of accreditation passes.
Image Data – specifically photographs	For accreditation purposes.	Legitimate Interests: we need the ability to use your image for the purposes of accreditation check and the production of accreditation passes in connection with the ceremonies.
Profile Data	To try to provide you with the relevant volunteer role in your preferred area and location.	Legitimate Interests: in order to allocate you a suitable volunteer role.
Health and Accessibility Data	To ensure we treat everyone equally and fairly and support your needs.	<p>Equality of opportunity and treatment for reasons of substantial public interest;</p> <p>Made public by you: you may provide us with information about specific requirements we need to consider for which you tell us about your health, mental or physical conditions. When you provide us with this information we consider that you are making this information manifestly public to our organisation and we will use this information on this basis, but only for the purposes of supporting your</p>

		needs.
Skills and Experience Data	To allow you to provide your specific skills or experience at our events, to ensure that you are adequately qualified for specialist volunteer roles and to ensure that we have the requisite number of medical professionals at the ceremonies .	Legitimate Interests: we need to process this personal data to facilitate the provision of your skills and experience at the ceremonies ;  To comply with a legal or regulatory obligations (including for health and safety and insurance purposes) for statutory or government purposes or to exercise a protective function for reasons of substantial public interest.
Uniform and Costume Sizing Data	To provide the relevant data to our uniform or costume supplier (see below) to enable the uniform or costume supplier to order the correct amount of material to manufacture the uniforms or costumes and consequently manufacture the uniforms or costumes.	Legitimate Interests: we need the ability to collect and share this data with our uniform or costume supplier in order to provide volunteer uniforms or costumes

We do not use any form of automated decision-making (including profiling) which could have a negative impact on you.

### 3. What is the lawful basis for processing?

In general, we do not require your consent to process your personal information because the processing is necessary:

- in order to provide you with the information or services that you've requested, or
- in order to respond to your enquiry, or
- for our legitimate interests, which are
  - to develop and diversify our business, and
  - to provide us with insight into the types of people who use our services (this basis applies to business-to-business direct marketing in particular), or
- in order to comply with the law.

However, you do have the right to object to how we process your personal information, or ask us to restrict processing.

If you object to or ask us to restrict the processing of your personal information, this won't affect the lawfulness of the processing we've already carried out.

Please see your rights below for more details.

#### **4. Sharing your personal information with others**

Sometimes we need to share your personal information with others. We will only do this for the purposes explained in this privacy notice and we'll take steps to ensure they keep the information secure and confidential and use it only for the agreed purposes.

We may share your personal information with the following third parties:-

- our event or service partners, including The Organising Committee of the Birmingham 2022 Commonwealth Games Limited ("OC"), so that they can (i) use your data for accreditation and background security purposes; and (ii) to contact you in relation to matters that you have expressed an interest in (including marketing communications where you have expressed an affirmative interest in receiving such communications). Where such a transfer takes place, and the OC is deemed controller of that personal information, the relevant privacy notice of the OC shall apply in respect of the OC's subsequent use. We may also engage the OC in the capacity of our data processor in order to assist us in communicating with you regarding your application and to administer our relationship with you.
- To DanceXchange Limited ("DanceXchange"), and the OC, in the case of Critical Mass volunteers who register to be part of the Opening Ceremony, so that they can use your personal data to make the necessary logistical and travel arrangements related to your participation. Where such a transfer takes place, and DanceXchange or the OC is deemed controller of that personal information, the relevant privacy notice of DanceXchange and/or the OC shall apply in respect of the DanceXchange's and/or OC's subsequent use (DanceXchange's Privacy Policy can be found at <https://dancexchange.org.uk/privacy-policy/> and the OC's privacy notice can be found at <https://www.birmingham2022.com/privacy-notice/>). We may also engage DanceXchange and/or the OC in the capacity of our data processor in order to assist us in communicating with you regarding your application and to administer our relationship with you;
- In the case of individuals who register to participate in the Opening Ceremony as part of a choir group, we may share your forename and surname with the lead of the choir that you specified to us at the point of registration that you are part of for the purpose of them confirming your registration;
- our service providers, for example IT support contractors and professional advisers, so that we can run our business;
- dispute resolution bodies, government bodies or the courts, where we are under a legal obligation to do so, or to protect our rights or property, or the safety of our people, clients or others, so that we can meet our legal obligations.



Some of these may be located outside the UK, where data protection laws are different. However, we will ensure that we comply with data protection laws when making any transfers outside the UK (for example, by signing appropriate contracts) to make sure your personal information is protected. Please contact us if you would like more details about transfers outside the UK.

## **5. How we protect your personal information**

We employ up to date technologies and systems to protect your personal information from unauthorised disclosure or damage or misuse.

We regularly review all our systems, policies and technologies to ensure that these continue to work effectively to protect your personal information.

## **6. How long we keep your personal information**

We will keep your personal information for as long as we are using it for the purposes explained in this notice.

When we no longer need it, we archive it and, subsequently, delete it after a period of 7 years.

We set these periods according to the time limits on legal claims. This is for our protection and yours.

We may in certain circumstances need to hold your personal information for longer, for example in relation to a legal dispute or because of regulatory requirements.

## **7. Your rights**

You have a number of rights under data protection laws. These are:

- to request access to your personal information,
- to request that your personal information is corrected if it is out of date, inaccurate or incomplete,
- to request that your personal information is deleted or removed from our records and systems,
- to make a complaint to the Information Commissioner's Office.

You also have the right:

- to withdraw your consent to the processing of your personal information (where we need your consent to process your personal information),
- to object to or restrict the processing of your personal information (where we don't need your consent to process your personal information),
- to obtain an electronic file of your personal information or have it transferred to another data controller in limited circumstances.

### **How do I exercise my rights?**

If you would like to make a request to access or correct your personal information, or to exercise any of your other rights, you can contact us at any time using the details set out 'Contacting Us' below.

We will respond to your request within one month from the date we receive it.

Please note that some of your rights are restricted, and apply only in certain circumstances. For example, we may refuse to delete your personal information whilst we need it for a valid purpose, including to defend any potential legal claims. We will set out in our response our reasons if we are unable to meet your request.

To find out how to make a complaint to the Information Commissioner's Office, see 'Contacting the Information Commissioner's Office' below.

### **8. Contacting us**

If you have any queries about how we use your personal information you can contact the Data Protection Officer through any of the following means:

By Post: Birmingham Ceremonies Limited, 6 Brindley Place, Birmingham, B1 2JB

By email: [euan.faulds@birminghamceremonies.com](mailto:euan.faulds@birminghamceremonies.com)

### **9. Contacting the Information Commissioner's Office**

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its [website](#).

The ICO can be contacted on 0303 123 1113, by using the [email form](#) on its website, or by writing to:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

### **10. Changes to this privacy notice**

This privacy notice is current as at 11<sup>th</sup> April 2022. We may make changes from time to time and you should regularly check for updates.