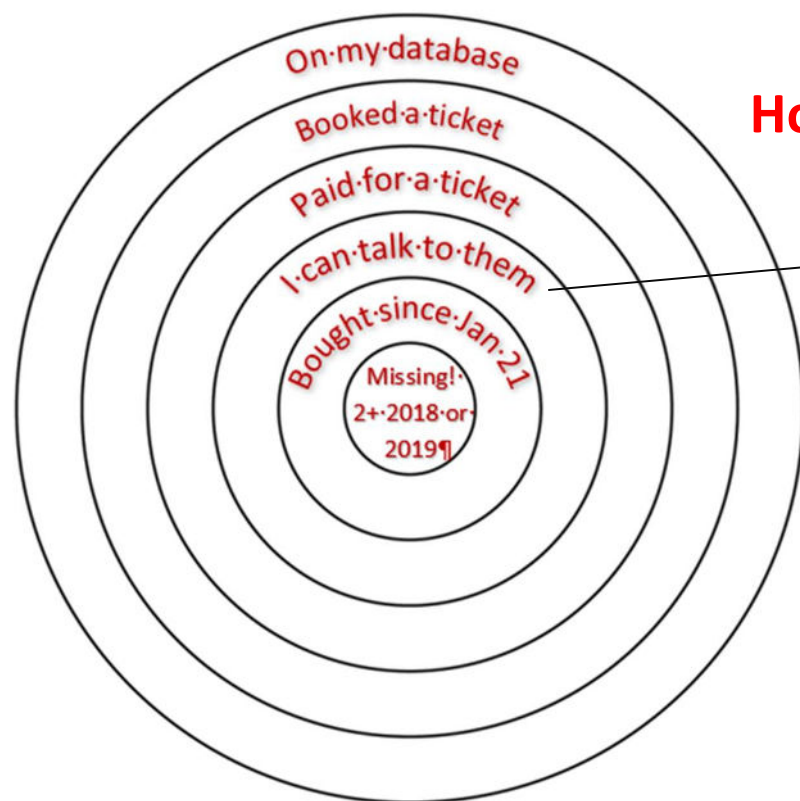


indigo

Katy Raines
CEO - Indigo Ltd

Remember this?



How can we increase this?

Typically less than 4/10

How can we gather more permissions – legally?

- > Most of you are asking people to ‘opt in’
- > Ticket buyers are busy trying to get to the end, so skip over consent boxes
- > How could we make agreeing to hear from you easier, and the ‘path of least resistance’ for ticket buyers?

My 3-step guide to GDPR for customer data

1: Be clear

with people what you're going to do with their data

2: Do

What you've said you'll do, and nothing else

3: Stop

Using their data when they stop engaging with you,
or when they ask you to

You can only 'process' personal data with a LEGAL basis. There are 6 of them:

a	Consent of the data subject
b	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
c	Processing is necessary for compliance with a legal obligation
d	Processing is necessary to protect the vital interests of a data subject or another person
e	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
f	Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

Legal bases for processing data

a	Consent of the data subject
b	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
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*	PECR/ePrivacy

Consent

- > Must be **granular** for each specific processing operation
- > Indication of consent must be **unambiguous** and involve clear **affirmative action**
- > Clear records must be kept to **demonstrate** consent
- > People must be able to easily withdraw consent

Examples of consent

If you would like to join our **e-mail** list to hear about our shows please tick this box.

If you would like to hear from us by **post** to hear about our shows please tick this box

If you would like to hear **by email** about opportunities to support our work please tick this box

If you would like to hear **by post** about opportunities to support our work please tick this box

Performance of a contract

- > Ticket buyer enters into a contract with you when they purchase a ticket
- > This gives you a right to process their data for the purpose of fulfilling this contract
- > Includes contacting them (by any means given) in relation to their booking, payment, change of performer, cancelled performance, etc
- > BUT **not** upselling, fundraising or marketing – so be careful about your pre-show messaging
- > Also (legally) includes asking their opinion about the show and customer research

Examples of 'performance of contract'

- > Email confirming ticket transaction
- > Pre-show email (as long as it's just information)
- > Email / phone call informing people of a cancelled performance
- > 'Tell us what you thought' email / survey
- > Priority information for members (if that was part of the membership benefits listed)

Options for email marketing

- **Consent** (opt-in) – requires customers to actively tick a box indicating that they are happy to receive communications by email
- **Soft-opt-in / Legitimate interest** (opt-out) – this allows you to send emails:
 - To their **customers** who have **bought something** and given their email as part of the transaction
 - About **'similar goods and services'**
 - As long as they are given the **option to opt-out** at the point of sale
 - **AND** in **all subsequent email** communications
 - Can't share data with third parties

MAILING LIST SIGN-UPS

(if no purchase
being made)

TICKET BUYERS (at point of sale)

NB. Some organisations have found that soft-opt in achieves double amount of usable email data than opt-in/consent (depending on how it's implemented)

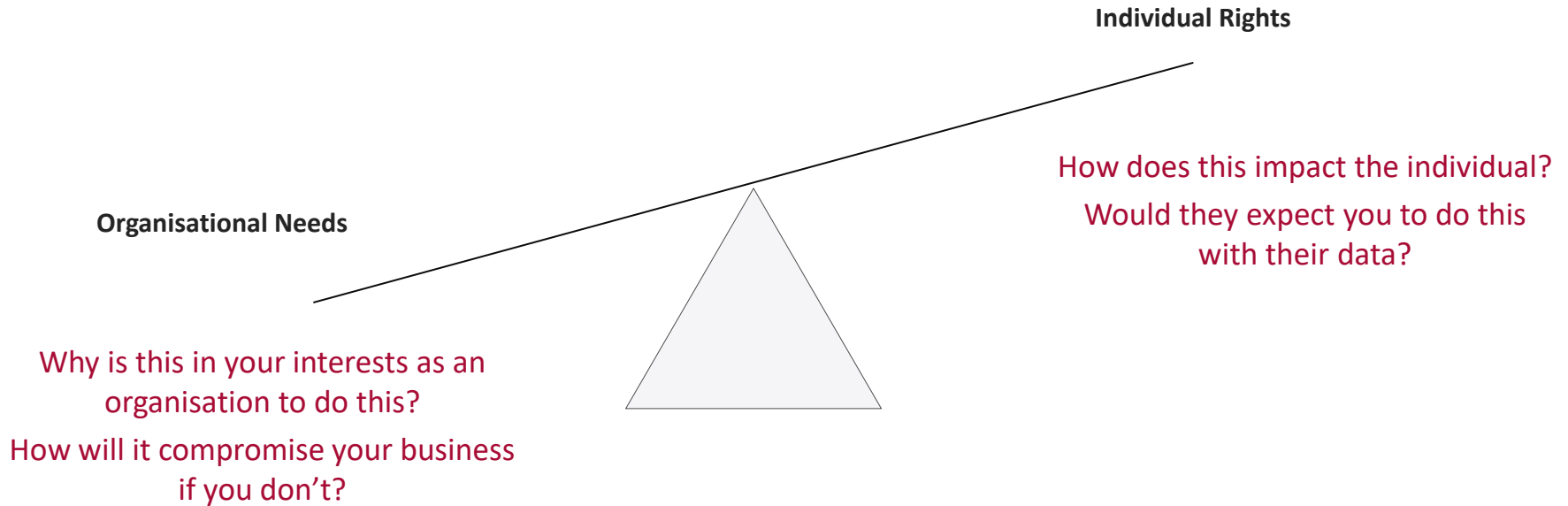
Legitimate Interest Actions

- a) A **'balancing test'** - Document how you've reached your decision – to show your business needs are 'in balance' with the rights of the individual.
- b) **Point of sale** notification and opt-out
- c) **Privacy Policy**
- d) **Unsubscribes** in all future emails

Our plan of action for these sessions

- a) Balancing the needs of the organisation with the rights of the customer (**Balancing Test**)
- b) Being clear with customers when they give their data (**Point of sale** and **Privacy policy**)
- c) Planning for **implementation**
- d) Measuring **success**

Balancing Test



Simple 2 page document – complete and keep
Email me: katy.raines@indigo-ltd.com for a pre-worked example

Trip Contact

We need these contact details to keep you updated about your trip.

- Tick this box if you **do not** want to receive marketing emails with our latest offers. You will need to repeat this step each time you make a booking to remain opted out, but you can unsubscribe at any time.

This will not affect service emails we send you related to your booking. See our [Privacy Statement](#) for more details.

Aer Lingus 

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LANCÔME
PARIS

1. My shopping bag ——— 2. My order

Identification

Enter your e-mail

If you already have an account, [click here to modify your e-mail](#).

Your first name*

Your surname*

Please confirm your e-mail*

- I would like to subscribe to the Lancôme newsletter to receive the latest news. Lancôme does not share or sell your personal information

CONFIRM

Example point of sale for both post AND email

Point of sale – website and Box Office script

*From time to time we will send you information about similar **events and ticket offers** and to ask your opinion via occasional customer **surveys**. You will need to repeat this step each time you book to remain opted out, but you can unsubscribe at any time.*

*If you would prefer NOT to receive these please **untick** the boxes below. See [here](#) for our privacy policy*



*I would like to receive information about events and ticket offers, and occasional surveys by **email***



*I would like to receive information about events and ticket offers, and occasional surveys by **post***