

San Francisco Opera Association Privacy Policy

INTRODUCTION

Welcome to the privacy policy of San Francisco Opera Association (“SFOA” / “us” / “we” / “our”).

SFOA has created this privacy policy in order to demonstrate our firm commitment to privacy. The following discloses our information gathering and dissemination practices for our website (sfopera.com). By entering our website, you are agreeing to be bound by the terms of this privacy policy. If you do not agree to this privacy policy, please do not access our website.

Our website and services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

1. IMPORTANT INFORMATION AND WHO WE ARE

CONTROLLER

For the purposes of data protection laws that may apply to you if you reside in the European Union (“EU”), the controller (i.e. the company that determines the purposes and means of the processing of your personal data) will be San Francisco Opera Association.

CONTACT DETAILS

Full name of legal entity: San Francisco Opera Association

Email address: webmaster@sfopera.com

Postal address: 301 Van Ness Avenue, San Francisco, CA 94102-4509

Telephone number: +1(415) 864-3330

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on July 1, 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information relating to an identified or identifiable individual.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, and title.
- **Contact Data** includes billing address, home address, delivery address, email address and telephone numbers.
- **Transaction Data** includes details of goods or services you have obtained from us (including tickets and via our online shop), provided to us, or expressed an interest in obtaining from us or providing to us.
- **Financial Data** includes bank account and payment card details, invoicing details, amounts of sums owed or provided, records of invoices paid and outstanding, and any other details of payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data** includes your patron number, your username and password, your interests, preferences, complaints, questions, comments, other feedback and any personal data that you provide to us in an application for volunteering with us, taking part in an audition, becoming a supernumerary, joining our national patrons club, working or interning with us (including information in your resume, cover letter, and application details such as your reasons for applying, preferences, skills and background).
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We are required to specify these legal bases and legitimate interests to you if you reside in the EU under EU data protection laws.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need further details about any of the lawful basis/es set out in the table below.

Purpose/Activity	Type(s) of personal data	Lawful basis/es for processing including basis of legitimate interest
To respond to any general contact you make with us through the contact sections of our website	(a) Identity (b) Contact (c) Profile (d) Technical (e) Usage	Necessary for our legitimate interests (to ensure that we respond appropriately to your message, including any questions / comments / complaints that you may have, to provide you with information about our activities and to try and develop a relationship with you)
To process any ticket purchase you make through our website	(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction	(a) Necessary for our legitimate interests (to obtain payment for tickets that we advertise, to manage venue and seating requirements, to ensure that we have a record of your purchase) (b) Necessary to comply with a legal obligation (c) Necessary for the performance of a contract to which you are a party
To process any donation you make to us through our website	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (processing donations, getting to know supporters, ensuring we have the facilities and resources to work with new supporters)

	(d) Financial (e) Transaction	(b) Necessary to comply with a legal obligation (c) Necessary for the performance of a contract to which you are a party
To process any purchase you make through our online shop	(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction	(a) Necessary for our legitimate interests (processing and dispatching your order, managing our stock, keeping a record of your purchase) (b) Necessary to comply with a legal obligation (c) Necessary for the performance of a contract to which you are a party
To process any employment / volunteer / internship / audition / supernumerary application you make to us through our website (and by mail)	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (getting to know employees or potential employees / performers / interns / volunteers, fulfilling our staffing requirements, ensuring potential recruits of any kind are appropriately qualified for the positions they apply for) (b) Necessary to comply with legal obligations related to applications and employment (c) Necessary for carrying out our obligations / exercising our rights as authorised by law (d) Necessary for the performance of a contract to which you are a party
To understand how our website is used	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of visitors, to keep our website updated and relevant, to develop our marketing strategy)
To send you marketing communications if you sign up to our mailing list on our website	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our services and raise awareness of our activities)
To administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for provision of IT services, to take steps to ensure network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how users use our website and to inform our marketing strategy)
To comply with court orders, litigation procedures and any other legal processes	All	(a) Necessary for our legitimate interests (in order to fully represent ourselves and manage our reputation and interests in connection with any legal procedures) (b) Necessary to comply with a legal obligation
To assist national law enforcement / security agencies or respond to requests from public, governmental	All	(a) Necessary for our legitimate interests (in order to fully represent ourselves and manage our reputation and interests in connection with any

and regulatory authorities		such assistance or requests) (b) Necessary to comply with a legal obligation
----------------------------	--	---

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

In addition, if your primary residence is located within a country that is a member of the EU you will receive marketing communications from us only if you have provided your consent to receive those communications.

COOKIES

Cookies are a kind of short-term memory for the Internet. They are stored in your browser and enable a site to 'remember' little bits of information between pages or visits.

Cookies are widely used to make the Internet experience more personal. We do not share information from cookies with any third parties. If you do not want us to use cookies, please adjust the settings on your browser so they are not allowed which may disable some features of the website. You may find instructions on how to disable cookies by using a search engine.

Our website may also use “tracking tags” which are Uniform Resource Locators (URLs) that are added to a web page. These tags collect non-personal information about your use of our website.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Service providers based in the US who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the US who provide consultancy, banking, legal, insurance and accounting services.
- Regulatory or governmental authorities, who require reporting of processing activities or disclosure of personal data in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

If you are based in the EU, using our website and services will involve a transfer of your data outside the European Economic Area. Please contact us if you want further information on such transfers.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data per our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

8. YOUR LEGAL RIGHTS

If you reside in the EU, you may have the following rights in relation to your personal data under EU data protection laws:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Complain to your national supervisory authority regarding the processing of your personal data

If you wish to exercise any of the rights set out above, please contact us using the contact details set out in section 1.