

Privacy Policy

Privacy policy SPOT Groningen
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Our organization – SPOT Groningen, a subsidiary of the Municipality of Groningen, located at Trompsingel 27 in Groningen – processes personal data. This privacy policy describes the types of data we process, how we protect your privacy as a customer, and how and why we use cookies. This privacy policy aligns with the privacy policy of the Municipality of Groningen.

1. What personal data do we process?

When you visit our website, we place cookies. See point 12 for more information about cookies.

When you purchase a ticket from us as a customer, we ask for the following information:

- Name
- Address, postal code, city, and country
- Email address
- Phone number
- Date of birth

You can choose to buy tickets with or without an account. Without an account, you only order your ticket(s). With an account, you can use waiting lists for sold-out events and adjust your preferences. You can also opt in to subscribe to one or more newsletters or join our loyalty program. With your account, you always have access to your tickets. We store your details in our customer database. If you paid for your tickets online, your bank account number will be saved in our database, so we can quickly refund your purchase in case of cancellation.

In addition to customer data, we manage data from contacts such as business relationships, CrossWise relations, education partners, donors, and the press. These contacts are managed in our relationship database, used when you request information or enter into a partnership or agreement with us. We collect the following personal data:

- Name
- Email address
- Phone number

2. Purposes and legal grounds for processing

We want to clarify why we process your personal data and what we do with it:

- Name: This is **necessary to execute the agreement**. Without a name, it is impossible to place an order or enter an agreement.

- Address, postal code, and city: This is **necessary to execute the agreement** if you wish to receive your ticket(s) by mail. Additionally, these details are **required for legitimate interests**, enabling us to assess if we are fulfilling our municipal mandate to reach a broad and diverse audience. We use your postal code and city data in anonymized visitor and profile analyses.

If you have signed up for our loyalty program, we will send you our magazine with your **consent**. We may also send you postal mailings based on your visit history, on the grounds of **legitimate interest**. As a loyal customer, we assume you value carefully curated information based on your preferences, with minimal privacy intrusion.

- Email address: This is necessary to **execute the agreement**. We use your email to send your e-ticket and a service email before your visit. You also need your email address to access your account on our website, if you chose to create one. For some events, we send a follow-up survey email, based on **legitimate interest**, as collecting feedback on our services is important with minimal privacy intrusion. If you signed up for our newsletters or loyalty program, we send you emails based on your preferences and/or visit history with your **consent**. You can withdraw this consent by unsubscribing at the bottom of the newsletter. If you want to use lockers at De Oosterpoort, we ask for an email address, necessary to **fulfill the agreement**.

- Phone number: This is necessary to **execute the agreement**. We may use your phone number in case of changes, cancellations, or emergencies regarding your visit. We may also contact you if you are on the waiting list for a sold-out event.

- Date of birth: This is used for **legitimate interest** to assess if we are fulfilling our municipal mandate to reach a broad and diverse audience. Your birth date is used anonymously in visitor analyses.

3. How long do we keep your data?

We retain your data in our database for a maximum of 7 years, allowing us to perform anonymized visitor and trend analyses. Long-term analysis enables us to monitor trends necessary to assess our municipal mandate to reach a broad and diverse audience.

4. Buying tickets anonymously

If you prefer not to have your data stored in our database, we offer the option to purchase tickets anonymously at the box office. If you do this, we cannot inform you of any changes, cancellations, or emergencies regarding your visit. We also cannot assist if you lose your tickets. You can find our box office hours on our website www.spotgroningen.nl.

5. Data Subject Rights

As a data subject, you have the following rights regarding the processing of your personal data in our database:

- Right to information: You have the right to ask if we process your personal data.
- Right of access: You have the right to view your data.
- Right to correction: You can request corrections to your data.
- Right to object, restrict, or delete data: You can request deletion of your data if it is no longer necessary for fulfilling the agreement. For instance, if you still have an upcoming event, your data will remain in our database until the event. Afterwards, we will anonymize and delete all identifiable data.
- Right to data portability: You have the right to request data in a format that allows you to transfer it easily to another party.
- Right to file a complaint: You may file a complaint with the Dutch Data Protection Authority.

To exercise your rights, send an email to info@spotgroningen.nl specifying the right(s) you wish to exercise. We will respond within four weeks.

6. Data Processor Agreements

We have agreements with third parties involved in data processing.

These include:

- Genteware B.V.: processor and manager of our customer database;
- Ticketmaster: sales partner for certain concerts;
- Mailchimp/Mandrill: email processor;
- Stichting Digitaal Informatieplatform Podiumkunsten: manager of the DIP audience monitor;
- Tribe: processor and manager of our CRM system;
- Keynius: processor for locker usage at De Oosterpoort;
- Google: processor for website analytics;
- CJ2: hosting of the Genteware database;
- Zalsman Groningen B.V.: printer for printed materials;
- KW Theaterpromotie: producer and distributor of SPOT Magazine;
- Kiemfabriek and Arno Hoogma: website and traffic analysis managers.

7. Sharing data with third parties

We only share your data with third parties with your explicit consent. For example, if you want information from an artist, we share your name and email with them. To withdraw consent, contact the artist directly, as their privacy policy applies.

If we are a co-organizer of an event, your name and email address will be shared once with the event organizer. We do this based on the legal basis of **legitimate interest**.

If you buy tickets via Ticketmaster, they share your name, phone number, and email with us to fulfill the agreement, as stated in their privacy statement. We may use this information in case of event changes or to send service and evaluation emails. We do this based on the legal basis of **legitimate interest**. You can easily withdraw your consent for service and/or evaluation emails by unsubscribing at the bottom of the emails. If you indicate through Ticketmaster that you would like to receive newsletters from us, we will send you emails based on your preferences and/or visit history, on the basis of your **consent**. You can easily withdraw this consent by unsubscribing at the bottom of the relevant newsletter.

8. Security Measures

Our organization continuously optimizes customer data security. Our website is accessible only in a secure (HTTPS) environment, and data storage management adheres to ISO 27001.

9. Data Breaches

In the rare event of unauthorized access to personal data, we follow the municipal protocol for data breaches.

10. Data Protection Officer

The Municipality of Groningen has appointed a Data Protection Officer, reachable at fg@groningen.nl.

11. Camera Surveillance

SPOT Groningen uses camera surveillance under specific conditions, as regulated by the Municipal Act, primarily for safety enhancement. Cameras are only used when necessary, and privacy requirements are in place.

12. What are cookies?

Cookies are small text files stored on your computer or mobile device when you use our website. They:

- Make website browsing easier and more enjoyable;
- Allow you to skip repetitive information entries;
- Enable features like the shopping cart;
- Help us improve the website through usage data;
- Show ads based on your interests.

13. Types of Cookies

We place:

- Functional or necessary cookies: for core website functions like the shopping cart.
- Analytical cookies: using Google Analytics for anonymous statistics.

With your permission:

- Third-party cookies: for social media and advertising (e.g., YouTube, Facebook).

14. Adjusting Browser Settings

If you prefer not to store cookies, adjust your browser settings. You'll receive a warning before cookies are placed. Visit www.youronlinechoices.com to turn off cookies from specific parties.