



# Data Protection Policy

## 1 Introduction

In order to operate, Southend Bach Choir needs to gather, store and use certain forms of information about individuals.

These can include members, freelancers, suppliers, audiences and potential audiences, business contacts and other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Southend Bach Choir's data protection standards and comply with the law.

### 1.1 What basis are we relying on (GDPR basis for processing personal data)

- Legitimate Interest
- Consent

### 1.2 Why is this policy important?

This policy ensures that Southend Bach Choir:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protects the group from the risks of a data breach

This policy applies to *all* those handling data on behalf of Southend Bach Choir, for example:

- Committee members
- Members
- Freelancers or 3<sup>rd</sup>-party suppliers

It applies to all data that Southend Bach Choir holds relating to individuals, which includes:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Emergency contact details
- Eligibility for Gift Aid
- Some bank details – treasurer only.

### 1.3 Roles and Responsibilities

The committee is the Data Controller and will determine what data is collected and how it will be used. The Data Protection Officer for Southend Bach Choir is the Choir's Chair and they, together with the other officers of the choir are responsible for the secure, fair and transparent collection and use of data by Southend Bach Choir. Any questions relating to the collection or use of data should be directed to the Data Protection Officer.



**Everyone** who has access to data as part of Southend Bach Choir has a responsibility to ensure that they adhere to this policy.

## 2 Data Protection Principles

### 2.1 We fairly and lawfully process personal data in a transparent way

Southend Bach Choir will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name and contact details will be collected when they first join the group and will be used to contact the member regarding group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for subscriptions. Where possible, this data will be anonymised.

Our lawful basis for this is that we have a legitimate interest in the collection and use of this data and, it is fair and reasonable in relation to Southend Bach Choir completing tasks expected as part of the individual's membership.

- The name and contact details of volunteers, committee members, employees and freelancers will be collected when they take up a position and will be used to contact them regarding group administration related to their role. Where possible, this data will be anonymised.

Our lawful basis for this is that we have a legitimate interest in the collection and use of this data and, it is fair and reasonable in relation to Southend Bach Choir completing tasks expected as part of working with these individuals.

- Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary, e.g. to claim Gift Aid from HMRC on subscriptions and donations where appropriate.
- An individual's name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event.

Our lawful basis for this is that we have a legitimate interest in the collection and use of this data and, it is fair and reasonable in relation to Southend Bach Choir completing tasks expected as part of the booking.

- An individual's name, contact details and other details may be collected at any time (including when booking tickets or at an event), with their consent, in order for Southend Bach Choir to communicate with them about and to promote group activities.

Our lawful basis for this is consent.

- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the Southend Bach Choir's website'.

Our lawful basis for processing this data is consent (see 'How we get consent').

## 2.2 We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

When collecting data, Southend Bach Choir will always provide a clear and specific privacy statement explaining to you why the data is required and what it will be used for.

## 2.3 We ensure any data collected is relevant and not excessive

Southend Bach Choir will not collect or store more data than the minimum information required for its intended purpose.

E.g., we need to collect telephone numbers from members in order to be able to contact them about group administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of group administration.

## 2.4 We ensure data is accurate and up-to-date

Southend Bach Choir will ask members, volunteers and staff to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer.

## 2.5 We ensure data is not kept longer than necessary

Southend Bach Choir will keep data on individuals for no longer than is necessary in order to meet the intended use for which it was gathered unless there is a legal requirement to keep such record.

The storage and intended use of data will be reviewed in line with Southend Bach Choir's Data Retention Policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

## 2.6 We keep personal data secure

- Southend Bach Choir will ensure that data held by us is kept secure.
- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard.
- Access to data will only be given to relevant committee members where it is clearly necessary for the running of the group. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data.

## 2.7 Transfer to countries outside the EEA

Southend Bach Choir will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (e.g. USA).

# 3 Individual Rights

When Southend Bach Choir collects, holds and uses an individual's personal data that individual has the following rights over that data. Southend Bach Choir will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

## 3.1 Individual's rights

- **Right to be informed:** whenever Southend Bach Choir collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- **Right of access:** individuals can request to see the data Southend Bach Choir holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection

Officer and will be complied with free of charge and within one month. Where requests are complex or numerous, this may be extended to two months.

- **Right to rectification:** individuals can request that their data be updated, where it is inaccurate or incomplete. Southend Bach Choir will request that members and freelancers check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- **Right to object:** individuals can object to their data being used for a particular purpose. Southend Bach Choir will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data, we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- **Right to erasure:** individuals can request for all data held on them to be deleted. Southend Bach Choir's data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made, we will comply with the request unless:
  - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
  - There is a legal requirement to keep the data.
- **Right to restrict processing:** individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, Southend Bach Choir will restrict the data while it is verified).

Though unlikely to apply to the data processed by Southend Bach Choir we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

### 3.2 Member-to-member contact

We only share members' data with other members with the subject's prior consent. As a membership organisation Southend Bach Choir encourages communication between members.

To facilitate this:

- Members can request the personal contact data of other members in writing via the Data Protection Officer. These details will be given, as long as they are for the purpose of contacting the subject (e.g. an email address but not financial or health data) and the subject consents to their data being shared with other members in this way.

### 3.3 Direct Marketing

Southend Bach Choir may collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box').
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box, if you would like Southend Bach Choir to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved').

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).



Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

### 3.4 Cookies on the website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

Southend Bach Choir currently only uses cookies on our website([www.southendbachchoir.org.uk](http://www.southendbachchoir.org.uk)) that are associated with the functionality of our website provider; we do not store or manipulate personal data on our website. If this changes in the future, all members will be informed of the change, how it might affect them and how to decline the request or disable the cookies.

We will implement a pop-up box on "[www.southendbachchoir.org.uk](http://www.southendbachchoir.org.uk)" that will activate each new time a user visits the website. This will allow them to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent). It will also include a link to the web provider's Privacy Policy, which will outline which specific cookies are used and how cookies can be disabled in the most common browsers.