

# Data Protection policy



## Overview

### Key details

- Policy prepared by: Sudbury Choral Society Committee
- Approved by committee on: 17<sup>th</sup> May 2018
- Last review: April 2023
- Next review date April 2026

### Introduction

In order to operate, The Sudbury Choral Society (hereinafter called SCS) needs to gather, store and use certain forms of information about individuals.

These can include members, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people with whom SCS has a relationship with or regularly needs to maintain contact.

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

### Why is this policy important?

This policy ensures that SCS

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

## Roles and responsibilities

Who and what does this policy apply to?

This applies to *all* those handling data on behalf of SCS, e.g.:

- Committee members
- Members

It applies to all data that SCS holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

## Roles and responsibilities

Everyone who has access to data as part of SCS has a responsibility to ensure that they adhere to this policy.

### Data controller

The Data Controller for SCS is the Membership Secretary. They, together with the committee, are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

## Data Protection principles

### 1. We fairly and lawfully process personal data

SCS 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.
- The name and contact details of committee members, employees and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their role.

Further information, including personal financial information, may also be collected in specific circumstances in order to process relevant payment to the person or SCS.

- 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.
- 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 SCS to communicate with them about group activities, and/or for Direct Marketing. See 'Direct Marketing' below.

### 2. We only collect and use personal data for specified and lawful purposes.

When collecting data, SCS will always explain to the subject why the data is required and what it will be used for, e.g.

*"Please enter your email address in the form below. We need this so that we can send you email updates for group administration including about rehearsal and concert schedules, subscription payments and other business."*

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to third parties without the explicit consent of the subject.

### **3. We ensure any data collected is relevant and not excessive**

SCS will neither collect nor 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.

### **4. We ensure data is accurate and up-to-date**

- SCS will ask members to complete an application form when they join and inform the Data Controller if any changes occur during their period of membership. This application form will contain a consent statement for any data collected to be used for the purposes of running SCS and members will be required to sign the form to that effect.
- Any individual will be able to update their data at any point by contacting the Data Controller.

### **5. We ensure data is not kept longer than necessary**

SCS will keep data on individuals for no longer than 12 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records (e.g. in the case of gift aid contributions where data needs to be kept for 6 years).

### **6. We process data in accordance with individuals' rights**

The following requests can be made in writing to the Data Controller:

- Members and supporters can request to see any data stored on about them. Any such request will be actioned within 28 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 28 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 28 days of the request being made.

### **7. We keep personal data secure**

SCS 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 role/position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored securely
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the group. The Data Controller will decide in which

situations this is applicable and will keep a master list of who has access to data

## Member to member contact

### **We only share members' data with other members with the subject's prior consent**

As a membership organisation SCS encourages communication between members.

To facilitate this:

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

## Direct Marketing

SCS will regularly 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.

Whenever data is collected for this purpose, we will provide:

- A clear and specific explanation of what the data will be used for (e.g. *Sign here if you would like SCS to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved*)
- A method for users to show their active consent to receive these communications (e.g. a signature will always be required)

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 3<sup>rd</sup>-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.