

# Havering Singers

## ..... Data Protection (Privacy & Retention) Policy

### Overview

#### Key details

- Policy prepared by: Donna Coy/Pam Ball/Trevor Marlow/Steve Wraight.
- Approved by Committee on: 13<sup>th</sup> November 2018
- Next review date: 13<sup>th</sup> November 2020

#### Introduction

In order to operate, Havering Singers needs to gather, store and use certain forms of information about individuals.

These can include members, suppliers, volunteers, audiences and potential audiences, business contacts and other people the Society 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 Havering Singers data protection standards and comply with the law.

#### Why is this policy important?

This policy ensures that Havering Singers:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protects the Society 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 Havering Singers, e.g.:

- Committee members
- Members
- Volunteers & Contractors
- Suppliers

It applies to all data that Havering Singers 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 Havering Singers has a responsibility to ensure that they adhere to this policy.

### **Data controller**

The Data Controllers for Havering Singers are Steve Wraight ( Membership Secretary) & Trevor Marlow (Treasurer). 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 Controllers.

## **Data protection principles**

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

Havering Singers will only collect data where lawful and where it is necessary for the legitimate purposes of the Society.

- A member's name and contact details will be collected when they first join the Society, and will be used to contact the member regarding Society membership administration and activities. Other data may also subsequently be collected in relation to their membership, including about their payment history for 'subs'.
- The name and contact details of committee members, employees, volunteers and contractors will be collected when they take up a position, and will be used to contact them regarding Society administration related to their role.
- Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary (e.g. in order to process payment to the person).
- Photographs of members, patrons and volunteers may be taken and published on Havering Singers website and in printed material.
- Lawful basis for publishing photographs of members, patrons and volunteers without specific identification: Legitimate interest (the publication is necessary for the better promotion of Havering Singers activities)

- 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 Havering Singers to communicate with them about Society 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, Havering Singers 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 Society administration including about rehearsal and concert schedules, subs 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**

Havering Singers will not collect or store more data than the minimum information required for its intended purpose.

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

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

Havering Singers will ask members, employees and volunteers to check and update their data on an annual basis.

Any individual will be able to update their data at any point by contacting either of the Data Controllers.

## **5. Data Retention**

Havering Singers will keep personal data on individuals (members, friends, participants in choral events, freelancers, and consenting supporters) for no longer than 12 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records. Data used for choir legitimate interests such as a member's image in group photos may continue to be used.

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

The following requests can be made in writing to either of the Data Controllers:

- Members, volunteers and supporters can request to see any data stored about them. Any such request will be actioned within 21 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 21 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 21 days of the request being made.
- Members and supporters can object to any storage or use of their data that might cause them substantial distress or damage or any automated decisions made based on their data. Any such objection will be considered by the Committee and a decision communicated within 28 days of the request being made.

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

Havering Singers 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 in a unit capable of being locked.
- Keys for locks securing physical data files should be collected by the Data Controller from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position.
- Access to data will only be given to relevant Committee members where it is clearly necessary for the running of the Society. The Data Controllers will decide in what situations this is applicable and will keep a master list of who has access to data.

## **8. Regular Data Review**

A regular review of all data will take place to establish if Havering Singers still has good reason to keep and use the data held at the time of the review.

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review will take place before 1 September 2020.

## **9. Data to be reviewed**

Havering Singers stores data as follows :

- In digital documents stored on personal devices held by members of the Committee and other members of Havering Singers holding certain roles
- On third party online services
- In paper documents stored at the homes of committee members

## **10. Who the review will be conducted by**

The review will be conducted by a selected subcommittee, exact members to be decided on at the time of the review.

## **11. How data will be deleted**

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
- Priority will be given to any instances where data is stored in active lists (e.g. where it could be used.
- Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

## **12. Transfer to countries outside the EEA**

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

## **Member-to-member contact**

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

As a membership organisation Havering Singers encourages communication between members.

To facilitate this, Members can request the personal contact data of other members in writing via the Data controller or 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**

Havering Singers will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about Society news, fundraising and other Society activities.

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

- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Havering Singers 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 'tick box')

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.

## **Havering Singers website**

The Havering Singers website may contain links to other websites of interest, and to our Facebook page. However, once you have used these links to leave our site, you should note that we do not have any control over that or any other social media site. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website/social media site in question.

*Policy first adopted by Committee on: 13<sup>th</sup> November 2018*

*Most recently reviewed by Committee on: 13<sup>th</sup> November 2018*