

# Ealing Choral Society

## Data Protection Policy

### Overview

#### Key details

- Policy prepared by: Sue Clark, Chairman
- Approved by ECS Committee on: 21/05/2020
- Next review date: 21/05/2022

#### Introduction

In order to operate, Ealing Choral Society 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 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 Ealing Choral Society data protection standards and comply with the General Data Protection Regulations (GDPR).

#### Why is this policy important?

This policy ensures that Ealing Choral Society

- 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

### Roles and responsibilities

#### Who and what does this policy apply to?

This applies to *all* those handling data on behalf of Ealing Choral Society e.g.:

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

It applies to all data that Ealing Choral Society holds relating to individuals, including:

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

## **Roles and responsibilities**

Ealing Choral Society is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for Ealing Choral Society is the Chairman, who, together with the Trustees, is responsible for the secure, fair and transparent collection and use of data by Ealing Choral Society. 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 Ealing Choral Society has a responsibility to ensure that they adhere to this policy.

Ealing Choral Society uses third party Data Processors (e.g. wegottickets.com) to process data on its behalf. Ealing Choral Society will ensure all Data Processors are compliant with GDPR.

## **Data protection principles**

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

Ealing Choral Society will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's or associate'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 will also be collected in relation to their membership, including voice test records, height (for seating plan purposes) and payment history in relation to Gift Aid. The name and phone number of the person to contact in an emergency are stored if supplied by the member.
  - o Lawful basis for processing this data: Contract- to fulfil the contractual obligation implied by signing up for membership (the collection and use of data is fair and reasonable in relation to Ealing Choral Society completing tasks expected as part of the individual's membership).
  - o Members and Associates are asked to give their consent to appear in any ECS photographs and videos taken since May 2018. Lawful basis for processing this data: Consent (see 'How we get consent')
- The name and contact details of volunteers 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 and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).

- o Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Ealing Choral Society completing tasks expected as part of working with the individuals).
- 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.
  - o Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Ealing Choral Society 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 Ealing Choral Society to communicate with them about concerts and promote group activities. See 'How we get consent' below.
  - o Lawful basis for processing this data: Consent (see 'How we get 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 Ealing Choral Society website' below.
  - o Lawful basis for processing this data: Consent (see 'How we get consent').

**b) 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, Ealing Choral Society will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

**c) We ensure any data collected is relevant and not excessive**

Ealing Choral Society will not collect or store more data than the minimum information required for its intended purpose.

**d) We ensure data is accurate and up-to-date**

Ealing Choral Society will remind members and associates annually to update their data when changes occur. Any individual will be able to check or update their data at any point by contacting the Membership Secretary, Associates Secretary or the Data Protection Officer (Chairman).

**e) We ensure data is not kept longer than necessary**

Ealing Choral Society will keep records 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 records).

The storage and intended use of data will be reviewed in line with Ealing Choral Society 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.

## We keep personal data secure

Ealing Choral Society will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment. Home computers will be password protected and passwords will not be shared with family members.
- Passwords for electronic data files held on the ECS website committee area will be re-set annually or each time a post holder leaves their post and no longer requires access to data.
- Any physically-held data (e.g. membership forms) will be stored in lockable containers.
- Access to data will only be given to relevant Trustees/Committee Members/contractors/other Society members in a short-term role 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.

### **f) Transfer to countries outside the EEA**

Ealing Choral Society will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

## **Individual Rights**

When Ealing Choral Society collects, holds and uses an individual's personal data that individual has the following rights over that data. Ealing Choral Society 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.

### **Individual's rights**

- *Right to be informed:* whenever Ealing Choral Society 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 Ealing Choral Society 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. Ealing Choral Society will request that members, staff and contractors 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. Ealing Choral Society 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. Ealing Choral Society 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:
  - o There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
  - o 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, Ealing Choral Society will restrict the data while it is verified).

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

## Member-to-member contact

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

## How we get consent

Ealing Choral Society will collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, 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.

Data collected will only ever be used in the way described and consented to.

Every marketing communication will contain a method through which a recipient can withdraw their consent. Opt-out requests will be processed within 28 days.

## Cookies on the Ealing Choral Society 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.

Ealing Choral Society uses cookies on our website [www.ealingchoralsociety.org.uk](http://www.ealingchoralsociety.org.uk) in order to monitor and record activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

We will implement a pop-up box on [www.ealingchoralsociety.org.uk](http://www.ealingchoralsociety.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).

Our Site uses the following types of cookies for the purposes set out below:

Type of cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
<i>Functionality Cookies</i>	These cookies allow our Site to remember choices you make when you use our Site, such as remembering your login details. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies here: <a href="https://developers.google.com/analytics/resources/concepts/gaConceptsCookies">https://developers.google.com/analytics/resources/concepts/gaConceptsCookies</a></p> <p>You can find out more about how Google protects your data here: <a href="http://www.google.com/analytics/learn/privacy.html">www.google.com/analytics/learn/privacy.html</a>.</p> <p>You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available via this link: <a href="http://tools.google.com/dlpage/gaoptout?hl=en-GB">http://tools.google.com/dlpage/gaoptout?hl=en-GB</a></p>

## Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings”, “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com.uk](http://www.youronlinechoices.com.uk).

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognise your computer or mobile device and you may need to log in every time you visit our Site

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# Data Retention Policy

## Overview

### Introduction

This policy sets out how Ealing Choral Society will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of Ealing Choral Society Data Protection Policy.

### Roles and responsibilities

Ealing Choral Society is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for Ealing Choral Society is the Chairman who, together with the Trustees, is responsible for the secure and fair retention and use of data by the society. Any questions relating to data retention or use of data should be directed to the Data Protection Officer (Chairman).

## Regular Data Review

A regular review of all data will take place to establish if Ealing Choral Society 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 took place in May 2018 and the second review in May 2020.

## Data to be reviewed

- Ealing Choral Society stores data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- Physical data stored at the homes of committee members.

## Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other Committee Members to be decided on at the time of the review.

## 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.
  - o Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
  - o 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.

## Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate, do we have consent to use the data. This consent could be implied by previous use and engagement by the individual.	Continue to use	Get consent
Can the data be anonymised?	Anonymise data	Continue to use

## **Statutory Requirements**

Data stored by Ealing Choral Society may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Gift Aid declarations records
- Details of payments made and received (e.g. in bank statements and accounting records)
- Trustee meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details

## **Other data retention procedures**

### **Member data**

- When a member leaves Ealing Choral Society and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data.
- Unless consent has been given, data will be removed from all email mailing lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

### **Mailing list data**

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

### **Volunteer and freelancer data**

- When a volunteer or freelancer stops working with Ealing Choral Society and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data.
- Unless consent has been given data will be removed from all email mailing lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

### **Other data**

- All other data will be included in a regular two year review.