

# Two Castles Male Voice Choir Privacy and Data Protection Policy

Policy prepared by: James Macartney, General Secretary.

Approved by Two Castles Male Voice Choir Committee on: 6<sup>th</sup> November 2018

Next review date: November 2018

The Choir Data Controller is the Choir General Secretary

Two Castles Male Voice Choir (hereinafter called The Choir) is committed to maintaining high standards of privacy and data protection.

The purpose of this policy is to help us achieve our data protection and data security aims by:

- Notifying choir members of the personal information we hold about them and what we do with this information and how we keep it secure and their rights in relation to it.

We may amend this policy at any time and at the discretion of the choir committee. A copy of the current policy can be found on our website, <http://www.twocastlesmvc.org.uk>

Further details on the General Data Protection Regulation (GDPR) can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)).

## **1. Who is responsible for data protection and data security?**

1.1 The Choir committee has overall responsibility for ensuring that all personal information is handled in compliance with the law and has appointed a member of the managing committee as the Choir Data Controller with day-to-day responsibility for data processing and data security.

1.2 All members have personal responsibility to ensure compliance with this policy, to handle all personal information consistently with the principles set out here and to ensure that measures are taken to protect the

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data security. The managing committee have special responsibility for leading by example and monitoring and enforcing compliance.

1.3.1 This policy covers personal information is stored electronically or on paper in a filing system.

## 2.What personal information do we collect?

Type of information	Purpose	Legal Reason
Member's name, date of birth, address, telephone number(s), email address(es), voice/choir section, subscription record and attendance at rehearsals and concerts whilst a current member and for up to a year after ceasing to be a member.	Managing the Member's membership of the Choir and The Racing Club Warwick FC.	Performing the Choir's duties regarding the Member. For the purposes of our legitimate interests in operating the Choir.
Recordings at concerts or rehearsals, Photos and Videos of Members.	Putting on the Choir's website and social media pages.	We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw consent at any time by contacting us by email.
Name, email address and telephone numbers of each Choir member.	Information published on the Member Zone on the Choir website.	For the purposes of our legitimate interests in operating and promoting the Choir.

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Name, address, email address and telephone number for non-members purchasing concert tickets for up to a year after the date of the concert.	Sale of tickets.	For the purposes of our legitimate interests in operating the Choir.
The name and contact details of volunteers and contractors will be collected.	To contact them with regard to fulfilling work on behalf of the choir.	For the purposes of our legitimate interests in operating the Choir.

We will use this information to carry out our choir activities, to administer choir membership and to deal with any problems or concerns members may have.

The Choir does not hold credit card or bank details for members or non-members.

If a choir member considers that any information held about them is inaccurate then he should tell the Choir Data Controller and, if we agree that the information is inaccurate, then we will correct it. If we do not agree with the correction, then we will note the comments of the member.

We will take reasonable steps to ensure that personal information is kept secure and in general, we will not disclose personal information to others outside The Choir. However, we may need to disclose personal information about members:

- to comply with our legal obligations or assist in a criminal investigation or to seek legal or professional advice in relation to membership issues, which may involve disclosure to our lawyers, accountants or auditors and to legal and regulatory authorities, such as HM Revenue and Customs;
- to other parties which provide products or services to us. e.g. printing of newsletters.

By providing personal information to us, the choir member consents to the use of their personal information (including any sensitive personal data) in accordance with this policy.

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## **3. How we protect personal data**

- 3.1 We will not knowingly transfer personal data outside the European Economic Area without consent.
- 3.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 3.3 Please note however that where choir members or third parties are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 3.4 We will never sell personal data. We will not share personal data with any third parties without prior consent (which choir members are free to withhold) except where we are required to do so by law or as set out in the table.
- 3.5 We will notify choir members or third parties promptly in the event of any breach of their personal data which might expose them to serious risk.

## **4. How long do we keep information?**

- 4.1 We will hold personal data on our systems for as long as somebody is a member of the Choir and for as long afterwards as it is in the Choir's legitimate interest to do so, or for as long as is necessary to comply with our legal obligations. We will review personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing the personal data of that person except that we will retain the personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.
- 4.2 We securely destroy all financial information once we have used it and no longer need it.

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## **5. Rights of Individuals**

- 5.1 Each choir member has rights under the GDPR:
- (a) to access their personal data.
  - (b) to be provided with information about how their personal data is processed.
  - (c) to have their personal data corrected.
  - (d) to have their personal data erased in certain circumstances.
  - (e) to object to or restrict how their personal data is processed.
  - (f) to have their personal data transferred to himself or to another entity in certain circumstances.
  - (g) If a choir member wishes to exercise any of these rights, they should contact the Choir Data Controller who should respond to the request within 4 weeks.
- 5.2 Choir members have the right to take any complaints about how we process their personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

**0303 123 1113**

**Information Commissioner's Office Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF**