

## The Amici Singers

### Data Protection Policy

#### **Overview**

##### Key Details

- Policy prepared by: Kate Mingay
- Approved by Committee on: Thursday 26 April 2018
- Next review date: Thursday 26 April 2019

##### Introduction

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

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

##### Why is this policy important?

This policy ensures that The Amici Singers:

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

#### **Roles and Responsibilities**

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

The policy applies to all those handling data on behalf of The Amici Singers, e.g.:

- Committee members
- Members
- Employees
- Suppliers

It applies to all data that The Amici Singers holds relating to individuals, including

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

##### Roles and Responsibilities

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

### Data Controller

The Amici Singers is the data controller in this instant. The named person with responsibility for data control is Kate Mingay. They, together with the committee are responsible for why data is collected and how it will be used. Any questions relating to the collection of use of data should be directed to Kate Mingay.

### **Data Protection Principles**

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

The Amici Singers will only collect data where lawful and where it is necessary for the legitimate purposes of The Amici Singers

- A member's name and contact details will be collected when they first join the choir, and will be used to contact the member regarding membership administration, logistical arrangements, pastoral support and other activities. Other data may subsequently be collected in relation to their membership, including their payment history for subs and eligibility to consent to Gift Aid.
- The name and contact details of committee members, volunteers and contractors will be collected when they take up a position and will be used to contact them regarding administration of the choir relating to their role.
- Further information, including financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payments to the person or in order to carry out a DBS check)
- An individual's name and contact details may be collected when they purchase a ticket to an event. This will be used to contact them about that specific event and future events.
- An individual's name, contact details or other details may be collected at any time (including when purchasing tickets or at an event), with their consent, in order for The Amici Singers to communicate with them about the activities of the choir and/or for direct marketing purposes. See 'Direct Marketing' below.

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

When collecting data, The Amici Singers will always explain to the subject why the data is required and what it will be used for.

We will never use data for any purpose other than that states or that can be considered reasonably to be related to it. 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

The Amici 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 choir administration.

4. We ensure data is accurate and up to date

The Amici Singers will ask members 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 the named person representing the Data Controller.

5. We ensure data is not kept longer than necessary

The Amici Singers 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.

6. We will process data in accordance with individual's rights

The following requests can be made to the Data Controller:

- Members, volunteers and supporters can request to see any data stored about them. Any such request should be submitted to the named person and will be actioned within 14 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request should be submitted to the named person and will be actioned within 14 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the request being made to the named person.
- 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 being 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 to the named person

7. We keep personal data secure

The Amici Singers will ensure that data held by us is secure.

- Electronically held data will be held within a password protected and secure environment and wherever possible in a central location.
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.

- Data that is physically held (e.g. membership forms or email sign-up sheets) will be stored in a cabinet that is capable of being locked. Any physical data files held by members prior to the introduction of this policy will either be moved to secure, lockable cabinets or if no longer necessary shredded and securely disposed of.
- 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.
- Access to data will only be given to relevant committee members where it is clearly necessary for the running of the choir. The Data Controller will decide in what 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 The Amici Singers encourages communication between members.

To facilitate this, members can request the personal contact data of other members in writing via their section leader. These details will be given, as long as they are for the purposes of contacting the subject (via email or telephone and no financial or health data will be shared) and the subject consents to their data being shared with other members in this way.

### **Direct marketing**

The Amici Singers will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about the choir, fundraising and other choir 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 The Amici Singers to send you updates via email/post 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 and not share with a third party without the express consent of the individual.
- Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. replying with UNSUBSCRIBE) as the title of the email). Opt out requests such as these will be processed within 14 days.

### **Cookies on the Amici Singers Website**

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

The Amici Singers use cookies on our website [www.amicisingers.net](http://www.amicisingers.net) in order to monitor and record their activity. This allows us to improve users' experience of our website and giving us useful insight into how users as a whole are engaging with the website.

We will implement a pop-up box on our website that will activate each time a new 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 (giving their implied consent).

The website will also include a link to our Privacy Policy which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.