

# Data Protection Policy

## Introduction

In order to operate Salford Choral Society needs to gather, store and use certain forms of information about individuals. These can include members, employees, 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 Salford Choral Society data protection standards and comply with the General Data Protection Regulations (GDPR).

## Why is this policy important?

This policy ensures that Salford 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.

## Who and what does this policy apply to?

It applies to all those handling data on behalf of Salford Choral Society, for example:

- Committee members
- Employees and volunteers
- Members
- Contractors/3rd-party suppliers

It applies to all data that Salford 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

Salford Choral Society is the Data Controller and will determine what data is collected and how it is used. The functions of the Data Protection Officer for Salford Choral Society are split between the Membership Secretary for members and the Publicity Officer for marketing and publicity. They, together with the choir committee, are responsible for the secure, fair and transparent collection and use of data by Salford Choral Society. Any questions relating to the collection or use of data should be directed to the appropriate Data Protection Officer. Everyone

who has access to data as part of Salford Choral Society has a responsibility to ensure that they adhere to this policy.

## **Data protection principles**

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

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

- A member's name, address, email and contact phone numbers will be collected when they first join the choir and will be used to contact the member regarding choir membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for 'subs'. Where possible Salford Choral Society will anonymise this data.
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Salford Choral Society completing tasks expected as part of the individual's membership).
- The name and contact details of volunteers, 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 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).
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Salford 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.
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Salford 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 Salford Choral Society to communicate with them about and promote group activities. See 'How we get consent' below.
  - 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, Salford 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***

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

For example, 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.

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

Salford Choral Society will ask members, volunteers and staff to check and update their data on a biannual basis. Any individual will be able to update their data at any point by contacting the membership secretary.

***E. We ensure data is not kept longer than necessary***

Salford 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 Salford 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.

***F. We keep personal data secure***

Salford 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.
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- Access to data will only be given to relevant trustees/committee members 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.

***G. Transfer to countries outside the EEA***

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