

# Data Protection Policy – Rochester Choral Society (RCS)



## Overview

### Key details

- Policy prepared by: Rochester Choral Society
- Approved by Committee on: Monday 14<sup>th</sup> May 2018
- Next review date: October 2019 (following the AGM)

### Introduction

In order to operate, Rochester 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 Rochester Choral Society's data protection standards and comply the General Data Protection Regulations (GDPR) which come into effect on 25 May 2018.

### Why is this policy important?

This policy ensures that Rochester Choral Society:

1. Protects the rights of our members, volunteers and supporters
2. Complies with data protection law and follows good practice
3. Protects the Society from the risk 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 Rochester Choral Society, for example,

- Committee members
- Employees and volunteers
- Members of the Rochester Choral Society and of the Rochester Choral Society Chamber Choir
- Friends of the Rochester Choral Society
- 3rd-party suppliers, for example, the Maidstone Area Arts Partnership (MAAP)

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

- Names
- Email addresses
- Postal addresses
- Telephone and mobile numbers
- Any other personal information held (for example, financial and gift aid declarations)

### **Responsibilities**

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

### **Data Protection Officer**

The Data Protection Officer for Rochester Choral Society is Mary Burslem – Secretary. The Secretary, together with the committee, is 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 Protection Officer.

## **Data Protection Principles**

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

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

- i. A member'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 may also subsequently be collected in relation to their membership, including on their payment history for 'subs'. Where possible Rochester Choral Society will anonymise this data.
- ii. The name and contact details of volunteers, committee members, 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.
- iii. 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).
- iv. 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.
- v. 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

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Rochester Choral Society to communicate with them about group 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, Rochester Choral Society will always explain to the subject why the data is required and what it will be used for, for example,

*“Please enter your email address in the form below. We need this so that we can send you email updates for group 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 3<sup>rd</sup> parties without the explicit consent of the subject.

### **3. We ensure any data collected is relevant and not excessive**

Rochester 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.

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

Rochester Choral Society will ask members, volunteers and staff 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 Data Protection Officer.

### **5. We ensure data is not kept longer than necessary**

Rochester Choral Society 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, for example, we are legally obliged to hold Gift Aid records for 6 years.

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

The following requests can be made in writing to the Data Protection Officer:

- i. Members, volunteers and supporters can request to see any data stored about themselves. Any such request will be actioned within 14 days of the request being made.

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- ii. Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- iii. 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.
- iv. 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 30 days of the request being made.

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

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

- i. Electronically-held data will be held within a password-protected and secure environment.
- ii. Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- iii. Physically-held data (for example, membership forms or email sign-up sheets) will be stored in a locked receptacle.
- iv. Keys for locks securing physical data files should be collected by the Data Protection Officer 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.
- v. Access to data will only be given to relevant trustees/committee members/contractors 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.

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

Rochester Choral Society will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (for example, USA).

## **Member to member contact**

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

As a membership organisation Rochester Choral Society encourages communication between members.

To facilitate this:

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- Members can request the personal contact data of other members in writing via the Data Protection Officer. These details will be given, as long as they are for the purposes of contacting the subject (for example, 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

Rochester Choral Society will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about news, fundraising and other group 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 (for example, 'Tick this box if you would like Rochester Choral Society 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 (for example, a 'tick box')

Data collected will only ever be used *in the way described and consented to* (for example, we will not use email data in order to market 3<sup>rd</sup>-party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (for example, an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

### Cookies on the Rochester Choral Society website

*A cookie is a small text file that is downloaded onto 'terminal equipment' (for example, 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.*

Rochester Choral Society does not currently use cookies on our website ([www.rochesterchoral.co.uk](http://www.rochesterchoral.co.uk)) in order to monitor and record their activity. However, we may in the future introduce their use as it will allow 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.rochesterchoral.co.uk](http://www.rochesterchoral.co.uk) that will activate each new

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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 (that is, give their implied consent).

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