



## DATA PROTECTION PRIVACY POLICY

### **Introduction**

In order to operate, Wincanton Choral Society (WCS) 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 WCS 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 WCS's data protection standards, and comply with the law.

### **Why is the policy important ?**

The policy ensures that WCS:

- Protects the rights of members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect WCS from the risks of data breach

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

This applies to all those handling data on behalf of WCS.

e.g:

- The Committee
- Volunteers
- Members
- 3<sup>rd</sup> party suppliers

It applies to all data that WCS holds relating to individuals, including:

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

## Roles and responsibilities

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

## Data control

The Committee is responsible for why data is collected and how it is used. Any questions relating to the collection or use of data should be directed to the Chairman, or Data Protection Officer.

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

WCS will only collect data where lawful, and where it is necessary for the legitimate purposes of the group.

A member's name and contact details will be collected when they first join WCS, and will be used to contact the member regarding WCS membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history or 'Subs'.

The names 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 WCS administration related to their role.

Further personal information may be requested should it be necessary for any lawful and specific circumstances.

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 allow them entry to the event.

An individual's name, contact details, and any necessary information may be collected at any time (including when booking tickets, or at an event), with their consent, in order for WCS to communicate with them about WCS activities.

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

When collecting data, WCS will always explain to the member why the data is required, and what it will be used for. e.g:

"Please enter your email address in the form below. We need this so that we can send you email updates for WCS 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 person.

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

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



#### **4. WCS ensures data is accurate and up-to-date**

WCS will ask members, volunteers, and staff to check and update their data on an annual basis. Any individuals will be able to update their data at any point by contacting the Data Protection Officer, or the Membership Secretary via [wcsmembers@yahoo.com](mailto:wcsmembers@yahoo.com).

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

WCS will keep data on individuals for no longer than 12 months after involvement with the individual has stopped, unless there is a legal requirement to keep records (e.g. for HMRC purposes)

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

The following requests can be made in writing to the Trustees:

- Members, volunteers, and supporters can request to see any data stored about them. Any such request will be actioned within 28 days of the request being made.
- Members, volunteers, and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 28 days of the request being made.
- Members, volunteers, and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 28 days of the request being made.
- Members, volunteers, and supporters can object to any storage or use of their data that might cause them substantial distress or damage, or any automated decisions based on their data. Any such objection will be considered by the WCS Committee, and a decision communicated within 30 days of the request being made.

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

WCS will ensure that data held by us will be kept secure.

Electronically held data will be held within a password protected and secure environment.

Passwords for access to electronic data files will be removed when an individual with data access leaves their role/position, and generic logins. e.g. if the Membership Secretary changes, access to [wcsmembers@yahoo.com](mailto:wcsmembers@yahoo.com) will have the password changed.

Physically held data (e.g. membership forms, or gift aid declarations), will be held at the home address of the relevant trustee and not transported unless absolutely necessary. The policy of WCS will be to hold the minimum amount of data in paper form. All physically held data will be handed over to the nominated officer when a person resigns their position.

Access to data will only be given to relevant committee members, members, or contractors where it is clearly necessary for the running of WCS. The committee members will decide in what situations this is applicable, and will keep a master list of who has access to data.

## 8. Miscellaneous points concerning data

WCS only shares members' data with other members with the member's prior consent.

WCS may collect data from consenting supporters for the Choir's marketing purposes only. This includes contacting them to promote concerts, updating them about WCS news, fundraising and other WCS activities. Any time data is collected for this purpose, WCS will provide:

- A clear and specific explanation of what the data will be used for. (e.g. "Tick this box if you would like WCS 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. (e.g. a tick box)

Data collected will only ever be used in the way described and consented to. (e.g. 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. (e.g. an 'unsubscribe' link in an email) Opt-out requests such as this will be processed within 14 days.

## 9. Cookies

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.

WCS was created using Wordpress which uses cookies as a default to manage login sessions and authentication, and for comments forms. Further information on cookies can be found in the WCS Privacy Notice.

Any queries can be address to: [wcsmembers@yahoo.com](mailto:wcsmembers@yahoo.com)

*Wincanton Choral Society*