

EC4 Music Data Protection Policy

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Introduction

In order to operate, EC4 Music need to gather, store and use certain forms of information about individuals. These can include members, contractors, suppliers, venues volunteers, audiences and potential audiences, sponsors 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 EC4 Music data protection standards and comply with the General Data Protection Regulation (GDPR).

Why is this policy important?

This policy ensures that EC4 Music

- 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?

This applies to *all* those handling data on behalf of EC4 Music e.g.:

- Committee members
- Members
- Contractors/3rd-party suppliers

It applies to all data that EC4 Music holds relating to individuals, including:

- Names
- Contact details, including email addresses
- Any other personal information held (e.g. financial)

Roles and responsibilities

EC4 Music is the Data Controller and will determine what data is collected and how it is used. The Data Protection Manager for EC4 Music is Lowri Williams, who, together with the other members of the committee, is responsible for the secure, fair and transparent collection and use of data by EC4 Music. Any questions relating to the collection or use of data should be directed to her.

Everyone who has access to data as part of EC4 Music has a responsibility to ensure that they adhere

to this policy.

EC4 Music uses third party Data Processors (e.g. Wix, Mailchimp, Ticketsource, Stripe, Dropbox, Google Docs) to process data on its behalf. EC4 Music will ensure all Data Processors are compliant with GDPR, including those suppliers based outside the EEA.

Data protection principles

a) **We fairly and lawfully process personal data in a transparent way**

EC4 Music 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 the group, and will be used to contact the member regarding group membership administration and activities.
- Lawful basis for processing this data: Contract- to fulfil the contractual obligation implied by signing up for membership (the collection and use of data is fair and reasonable in relation to EC4 Music completing tasks expected as part of the individual's membership).
- Members are asked to give their consent to appear in any EC4 Music photographs and videos taken since May 2018. Lawful basis for processing this data: Consent (see 'How we get consent')
- The name and contact details of volunteers 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.
- 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 EC4 Music 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 EC4 Music to communicate with them about concerts and promote group activities. See 'How we get consent' below.
- Lawful basis for processing this data: Consent (see 'How we get consent').
- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the EC4 Music website' 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, EC4 Music 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**

EC4 Music will not collect or store more data than the minimum information required for its

intended purpose.

d) We ensure data is accurate and up-to-date

EC4 Music will remind members and associates annually to update their data when changes occur. Any individual will be able to check or update their data at any point by contacting any member of the Committee.

e) We ensure data is not kept longer than necessary

EC4 Music 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). Contact data will be retained for a maximum of three years after the member's last contact with the choir, or, in the case of venues, after the concert has taken place.

f) We keep personal data secure

EC4 Music will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment. Home computers will be password protected and passwords will not be shared with family members.
- Passwords for electronic data files held on Google Docs will be re-set annually or each time a post holder leaves their post and no longer requires access to data.

g) Transfer to countries outside the EEA

EC4 Music 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 EC4 Music collects, holds and uses an individual's personal data that individual has the following rights over that data. EC4 Music 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.

- *Right to be informed:* whenever EC4 Music collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* individuals can request to see the data EC4 Music holds on them and confirmation of how it is being used. Requests should be made in writing to the Committee at info@ec4music.org and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. Any requests for data to be updated will be processed within one month. If email addresses are no longer accurate, they will be deleted from our records.
- *Right to object:* individuals can object to their data being used for a particular purpose. EC4 Music will always provide a way for an individual to withdraw consent in all marketing

communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.

- *Right to erasure*: individuals can request for all data held on them to be deleted. If a request for deletion is made we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
 - There is a legal requirement to keep the data.
- *Right to restrict processing*: individuals can request that their personal data be ‘restricted’ – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, EC4 Music will restrict the data while it is verified).

Though unlikely to apply to the data processed by EC4 Music we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

Member-to-member contact

We only share members’ data with other members with the subject’s prior consent.

How we get consent

EC4 Music will collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about group news, fundraising and other group activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a tick box).
- A clear and specific explanation of what the data will be used for.

Data collected will only ever be used in the way described and consented to.

Every marketing communication will contain a method through which a recipient can withdraw their consent. Opt-out requests will be processed within 28 days.

Cookies on the EC4 Music website

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.

EC4 Music uses cookies on our website www.ec4music.org in order to monitor and record activity. This allows us to improve users’ experience of our website by, for example, 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.ec4music.org that will activate each new 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 (i.e. give their implied consent).

Our Site uses the following types of cookies for the purposes set out below:

Cookie name	Life span	Purpose
svSession	Permanent	Creates activities and BI
hs	Session	Security
incap_ses_\${Proxy-ID}_\${Site-ID}	Session	Security
incap_visid_\${Proxy-ID}_\${Site-ID}	Session	Security
nlbi_{ID}	Persistent cookie	Security
XSRF-TOKEN	Persistent cookie	Security
smSession	Two weeks	Identify logged in site members

Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings”, “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com.uk.

Data Retention Policy

Introduction

This policy sets out how EC4 Music will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of EC4 Music Data Protection Policy.

Roles and responsibilities

EC4 Music is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for EC4 Music is Lowri Williams who, together with the other committee members is responsible for the secure and fair retention and use of data by the society. Any questions relating to data retention or use of data should be directed to her.

Regular Data Review

A regular review of all data will take place to establish if EC4 Music still has good reason to keep and use the data held at the time of the review. As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review took place in May 2018.

Data to be reviewed

- Data stored on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- Physical data stored at the homes of committee members.

Who the review will be conducted by

The review will be conducted by the Committee.

How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
- Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
- Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Confirm/update details
Where appropriate, do we have consent to use the data. This consent could be implied by previous use and engagement by the individual.	Continue to use	Get consent
Can the data be anonymised?	Anonymise data	Continue to use

Statutory Requirements

Data stored by EC4 Music may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments made and received (e.g. in bank statements and accounting records)
- Contracts and agreements with suppliers/customers
- Insurance details

Other data retention procedures

Member data

- When a member leaves EC4 Music, data will be removed from all email mailing lists, unless consent has been given,
- All other data will be stored safely and securely and reviewed as part of the next two year review.

Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

Volunteer and freelancer data

- When a volunteer or freelancer stops working with EC4 Music and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data.
- Unless consent has been given data will be removed from all email mailing lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

Other data

- All other data will be included in a regular two year review.

Updates to Policies

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.