

Islington Choral Society (“ICS”)

Data Protection Policy

Overview

Introduction

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

These can include members, 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 ICS data protection standards and comply with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

Why is this policy important?

This policy ensures that ICS:

- Protects the rights of our members, volunteers, supporters and contacts.
- Complies with data protection law and follows good practice.
- Is protected from the risks to the group 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 ICS, including::

- Committee members
- Musical director, deputy musical director, other freelancers and volunteers
- Members
- Contractors, third-party suppliers, tour operators, concert venues

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

- Names
- Email addresses

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

Roles and responsibilities

ICS is the Data Controller and will determine what data is collected and how it is used. The trustees and committee, together, are responsible for the secure, fair and transparent collection and use of data by ICS. Any questions relating to the collection or use of data should be directed to the Chairman or Secretary.

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

ICS may use third party Data Processors (e.g. Mail Chimp) to process data on its behalf. ICS will ensure all Data Processors are compliant with GDPR.

Data protection principles

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

ICS 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, in addition to certain other information such as their voice part, will be collected when they first join ICS, and will be used to contact the member regarding membership administration and ICS activities. Other data may also subsequently be collected in relation to their membership, including their payment history for tickets, subscriptions and music scores).
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to ICS completing tasks expected as part of the individual's membership).
- The names and contact details of freelancers, 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. Further information, including personal financial information, may also be collected in specific circumstances where lawful and necessary (e.g. in order to process payment to the person).

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to ICS completing tasks expected as part of working with the individuals),
- An individual's name and contact details may 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 ICS 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, at an event, when they visit our website or subscribe to our newsfeed), with their consent, in order for ICS to communicate with them about and promote group activities.
 - 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 ICS 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, ICS 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

ICS 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

ICS will ask committee members 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 Chairman or Secretary.

e) We ensure data is not kept longer than necessary

ICS will keep personal data 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). Records required for financial or tax reporting will be kept for at least six years.

The storage and intended use of data will be reviewed in line with our data retention policy (as to which see further below). 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

ICS 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 to those files leaves their role/position, and every six months in the meantime.
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard or secure storage space.
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the group.

g) Transfer to countries outside the EEA

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

Individuals' rights

- *Right to be informed:* whenever ICS 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 ICS holds on them and confirmation of how it is being used. Requests should be made to the Chairman or Secretary, 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. ICS will request that committee members, freelancers and contractors check and update their data on a two-yearly basis. Any requests for data to be updated will be processed within one month.
- *Right to object:* individuals can object to their data being used for a particular purpose. ICS 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 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, ICS will restrict the data while it is verified).
- *Right to erasure:* individuals can request for all data held on them to be deleted. ICS data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. 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.

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

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the relevant supervisory authority responsible for data protection. In the UK any such complaint should be directed to the Information Commissioner's Office: www.ico.co.uk.

Member-to-member contact

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

As a membership organisation, ICS encourages communication between members.

To facilitate this, members can request the personal contact data of other members in writing via the Chairman or Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address) and the subject has consented to their data being shared with other members in this way.

Obtaining consent

ICS may 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.

Where 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 (e.g. 'Tick this box if you would like ICS to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

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 third-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.

Cookies on the ICS 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.

ICS uses cookies on our website in order to monitor and record users' activity. This allows 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.islingtonchoralsociety.co.uk 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).

It will also include a link to our Privacy Policy.

Data Retention Policy

Overview

Introduction

This policy sets out how ICS will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of ICS' Data Protection Policy.

Roles and responsibilities

ICS is the Data Controller and will determine what data is collected and how it is used. The trustees and committee, together, are responsible for the secure, fair and transparent collection and use of data by ICS. Any questions relating to the collection or use of data should be directed to the Chairman or Secretary.

Regular Data Review

A regular review of all data will take place to establish whether ICS 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 two years and no more than 27 calendar months after the last review. The first review took place in May 2018.

Data to be reviewed

- ICS data included in digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- Data stored on third party online services (e.g. Google Drive, Mail Chimp)
- Physical data stored at the homes of committee members

Who the review will be conducted by

The review will be conducted by the Chairman and Secretary with other committee members to be decided on at the time of the review.

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	Ask the subject to 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 ICS may be retained based on statutory requirements for storing data other than data protection regulations. This might include, but is not limited to:

- Gift Aid declarations
- Details of payments made and received (e.g. in bank statements and accounting records)
- Trustee meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details
- Tax records

Other data retention procedures

All data will be stored safely and securely and be included in a regular two-year review. Additionally:

Member data

- When a member leaves ICS and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted.
- Unless consent has been given, data will be removed from all email lists.

Mailing list data

- If an individual opts out of a mailing list, their data will be removed as soon as is practically possible.

Volunteer and freelancer data

- When a volunteer or freelancer stops working with ICS and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted.
- Unless consent has been given, data will be removed from all email lists.

Policy last reviewed by the Committee: June 2018