

Data Protection and Retention Policy

In order to fulfil its legitimate objectives and operate efficiently, Ashtead Choral Society (ACS) needs to gather, store and use certain forms of information about individuals. For this purpose individuals can include Members, Friends, Patrons, freelancers and contractors, volunteers, audiences and potential audiences, business contacts and other people ACS has a relationship with or regularly needs to contact.

This policy explains how this information will be collected, stored and used in order to comply with the General Data Protection Regulations (GDPR) as transposed into UK law.

This policy applies to all those handling data on behalf of ACS, eg Trustees, Freelancers and Members.

The Trustees are responsible for the secure, fair and transparent collection and use of data by ACS.

DATA PROTECTION POLICY

PRINCIPLES

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

Members (including Friends and Patrons): Personal contact information will be collected when they first join ACS and will be used to contact the members regarding the administration of ACS and its activities. Payment history for subscriptions may also be collected. No other type of personal information will be gathered or retained without the express consent of the member concerned. Note that members participating in tours may be asked for additional relevant information, including insurance details, dietary requirements or about health issues which they feel the organisers should be aware of.

Contractors/Freelancers: The name and contact details of contractors/freelancers will be collected when they take up a position and will be used to contact them regarding Society administration related to their role. Personal financial information may also be collected in specific circumstances where necessary, eg in order to process payments.

Audiences: An individual's name and contact details may be collected when they purchase a ticket for an event. This will be used to contact them about their booking and to allow them entry to an event.

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

ACS only collects and uses personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

When collecting data, ACS will always provide a clear and specific privacy statement explaining why the data is required and what it will be used for.

Individuals' data will not be disclosed without consent to any external organisation, except as required by law, for example to HMRC for Gift Aid Declarations. Tour booking forms passed to ACS and containing personal information are handed on to the tour company.

ACS ensures that any data collected is relevant and not excessive.

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

ACS ensures data is accurate and up-to-date

Members are asked to update their contact information annually via the Membership Subscription form. Any individual will be able to update their details at any point by contacting the Membership Secretary.

ACS ensures data is not kept longer than necessary

ACS will keep data for no longer than is necessary in order to meet the intended use, unless there is a legal requirement to keep records.

ACS keeps personal data secure

ACS will ensure that data is kept secure:

- Electronically-held data will be kept within a password-protected and secure environment.
- Data held on paper (eg membership forms and lists) will be stored in a locked cabinet.
- Data will be made available only to those people within ACS who clearly need it to perform their duties for the running of ACS and are authorised by the Trustees to receive it. The Data Controller will keep a master list of who has access to data.
- When authorised people retire from their posts, they will be instructed to delete any such data they hold in electronic form and destroy paper records.

INDIVIDUAL RIGHTS

Individuals have the right to enquire as to the information ACS holds on them, and can request that their data be updated where it is inaccurate or incomplete. Requests should be made in writing to the Membership Secretary and will be complied with within one month.

Individuals can request that all data held on them is deleted. ACS's Data Retention Policy will ensure that data is not held for longer than is reasonably necessary in relation to the purpose for which it was originally collected. If a request for deletion is made, it will be complied with 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

MEMBER-TO- MEMBER CONTACT

Other than to authorised persons for the running of ACS (see above), members' contact details are only shared with other members with the subject's prior consent.

Requests for contact information should be made to the Membership Secretary.

Basic contact details (excluding postal addresses) of the Trustees and others with specific roles within ACS will be circulated to Members, usually via email.

CONSENT

ACS collects data from supporters for marketing purposes. These include contacting them to promote performances and updating them about news, fundraising and other activities organised by ACS.

Whenever data is collected for this purpose, ACS will provide a method for supporters to show their positive and active consent to receive these communications and a clear and specific explanation of what the data will be used for.

Data will not be passed to any external organisation.

Supporters will be informed how they can withdraw their consent at any time and such opt-out requests will be processed within a reasonable time.

DATA RETENTION POLICY

A regular review of all data will take place to establish if ACS 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 by a group of Trustees to be decided at the time.

Data to be reviewed includes all paper documents and digital documents stored on personal devices held by Committee members and other authorised persons and any data stored on 3rd party online services (eg GoogleGroups).

Deletion of Data

- Physical data will be destroyed safely and securely, including shredding
- All reasonable and practical efforts will be made to remove data stored digitally.

Statutory Requirements

Data stored by ACS may be retained based on statutory requirements for storing data. This may include but is not limited to:

- Gift Aid declaration records
- Details of payments made and received (eg in bank statements and accounting records)
- Trustee meeting minutes
- Contacts and agreements with freelancers
- Insurance details

Member Data

- When a member leaves ACS and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted – this might include bank details.
- 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

Supporters Group 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

Freelancer data

- When a volunteer or freelancer stops working with ACS 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.

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