

## **ALLEGRI SINGERS (REGISTERED CHARITY NUMBER 287271) (“Allegri Singers”)**

### **DATA PROTECTION POLICY**

#### **Introduction**

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

This information can concern members, external performers/contractors and audience members and supporters.

This policy sets out how this data will be collected, stored, used and retained in order to meet data protection standards and to comply with the General Data Protection Regulations (GPDR).

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

This applies to all handling data on behalf of the Allegri Singers, as a charitable organisation, including but not limited to committee members, members and contractors/suppliers.

It applies to all data that the Allegri Singers holds relating to individuals, including names, email addresses, postal addresses, phone number(s) and any other personal information.

#### **Roles and responsibilities**

The Allegri Singers is the Data Controller and will determine what data is collected and how it is used. The trustees and committee members are responsible for the secure, fair and transparent collection and use of data by the Allegri Singers.

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

The Allegri Singers uses third party Data Processors (eg Google Groups, Trello and Mail Chimp) to process its data on its behalf. The Allegri Singers will verify that all Data Processors confirm that they are compliant with GDPR.

#### **Data Protection Principles**

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

The Allegri Singers will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- Some or all of the following items of information will be collected from members when they first join the group:
  - Name
  - Address

- Telephone number(s)
- Email address

It will be up to individual members which items of data they provide to the group as a whole.

The data provided by individual members to the Allegri Singers will be used to contact the member, as part of the group membership list, about Allegri Singers rehearsals, performances, administration and social activities. It may also be used by individual members for the purpose of communicating with the group.

**Lawful basis for processing this data:** Contract (the collection and use of data as fair and reasonable in relation to the Allegri Singers completing tasks expected as part of the individual's membership of the Allegri Singers).

- The name and contact details of external performers/contractors will be collected when they agree to take up an engagement and will be used to contact them regarding group administration and arrangements in relation to such engagement.

Further information, including personal financial information, may also be collected in order to process payment to that person electronically. If this information is acquired, it will be kept within a secure platform. Such data will only be retained for as long as is necessary for the required purpose and shall be deleted from the Allegri Singers' bank records on request.

**Lawful basis for processing this data:** Contract (the collection and use of data as fair and reasonable in relation to the Allegri Singers completing tasks expected as part of working with such individual(s)).

- An individual's email address will be collected when they book ticket(s) for an Allegri Singers event electronically. This will be used to confirm their booking and to allow them entry to an event. Further details on the processing of this data is available in the Allegri Singers privacy policy.

**Lawful basis for processing this data:** Contract (the collection and use of data is fair and reasonable in relation to the Allegri Singers completing tasks expected as part of the booking).

- Pseudonymous or anonymous data (including behavioural, technological and geographical) on an individual may be collected via tracking 'cookies' when they access the Allegri Singers' website ([www.allegrisingers.org.uk](http://www.allegrisingers.org.uk)) or interact with the emails sent via our mailing list, in order for us to monitor and improve our effectiveness in these channels (see "Cookies on the Allegri Singers website" below).

**Lawful basis for processing this data:** Consent (see "How do 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, the Allegri Singers 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.**

The Allegri Singers will not collect or store more data than the minimum information required for the intended purpose.

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

The Allegri Singers will ask 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 chairperson(s).

**e) We ensure data is no kept longer than necessary.**

The Allegri Singers 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).

The storage and intended use of data will be reviewed at appropriate intervals. When the intended use is no longer applicable (for example a member has left the group and all administrative tasks relating to their membership have been completed) any potentially sensitive data will be deleted and, 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 regularly.

**f) We keep personal data secure**

The Allegri Singers will ensure that data held within central Allegri Singers records will be kept secure:

- Electronically-held data will be held within a secure environment.
- Physically-held data (eg gift aid forms) will be stored within a locked cupboard or drawer, accessible only by the applicable authorised member of the committee.
- Access to financial data and data relating to mailing list subscribers will only be given to relevant committee members or other members of the group and where it is clearly necessary for the running of the group.
- With regards to member to member contact, see "Member to Member Contact" below.

**g) Transfer to countries outside the EEA**

The Allegri Singers will not transfer data to countries outside the European Economic Area (EEA), except via a third party service provider who has confirmed that they have adequate protection for the individual's data privacy rights.

## **Individual rights**

When the Allegri Singers collects, holds and uses an individual's personal data that individual has the following rights over that data. The Allegri Singers 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 the Allegri Singers collects data it will provide a clear and specific privacy statement explaining why it is being collected and why it is being used.
- **Right of access:** individuals can request to see the data the Allegri Singers holds on them and confirmation of how it is being used. Requests will be complied with free of charge and within one month.
- **Right to rectification:** individuals can request that their data be updated where it is inaccurate or incomplete.
- **Right to object:** individuals can object to their data being used for a particular purpose. The Allegri Singers will always provide a way for an individual to withdraw consent in all marketing communications.
- **Right to erasure:** individuals can request for all data held on them to be deleted. The Allegri Singers will ensure that data is not held for longer than is reasonable necessary in relation to the purpose it was originally collected.
- **Right to restrict processing:** individuals can request that their personal data be "restricted" ; retained and stored but not processed further.

Though unlikely to apply to the data processed by the Allegri Singers, we will also ensure that rights related to portability and automated decision making are complied with where appropriate.

## **Member to member contact**

The Allegri Singers will only share members' data with other members with the subject's prior consent.

As a membership organisation the Allegri Singers encourages communication between members. To facilitate this, when members provide their personal contact data for the purpose of collating a membership list they will be asked for positive and active consent to circulate this data amongst the members of the group.

## **How we get consent**

The Allegri Singers will regularly collect data from consenting supporters for marketing purposes and to include them on an electronic mailing list. This data will be used to contact them to promote performances, update them on Allegri Singers group news, for fundraising and for other group activities. The data will not be used for any other purpose.

Whenever data is collected for this purpose, we will provide:

- A method for subscribers to show their positive and active consent to receive these communications.
- A clear and specific explanation of what the data will be used for.

Every marketing communication will contain an option for a recipient to withdraw their consent (eg an “unsubscribe” link). Opt-out requests will be processed within 14 days.

### **Cookies on the Allegri Singers website**

We use cookie technology when a person visits our website to collect and analyse anonymised data on how many people have visited, what pages they have looked at and other statistical information.

We will implement a pop-up banner to let users know about this on their first visit, and users will be able to disable cookies at any time in their browser if they do not wish their (anonymised) data to be tracked.

### **Data Retention**

The personal data held by the Allegri Singers will be reviewed regularly to establish if the Allegri Singers still has good reason to keep and use the relevant data.

As a general rule, the membership list will be reviewed every year and other personal data will be reviewed every 2 years. The review will be conducted by the chairperson(s) or other members of the committee.

Where data is deleted:

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

Where deleting the data would mean deleting other data that we have a valid lawful reason to keep, then the data may be retained safely and securely but not used.

Data stored by the Allegri Singers may be retained where required by statute other than data protection regulations. This might include but is not limited to:

- Gift aid declarations records
- Details of payments made and received
- Committee meeting minutes
- Contracts and agreements with contractors/external performers/suppliers

### **Member data**

- When a member leaves the Allegri Singers (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 mailing lists.
- All other data will be stored safely and securely and reviewed regularly.

#### **Mailing list data**

- If an individual unsubscribes from 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 regularly.

#### **External performer/contractor data**

- When a contractor or external performer stops working with the Allegri Singers (and all administrative tasks relating to their engagement has been completed) any potentially sensitive data held on them will be deleted.
- Unless consent has been given data will be removed from any email mailing lists.
- All other data will be stored safely and securely and reviewed regularly.

#### **Other data**

All other data will be included in regular reviews.

Date: 24th May 2018