

# CAPPELLA NOVOCASTRIENSIS

## Data Protection Policy

### Overview

#### Key details

- Policy prepared by: Sarah Lawrance, Choir Secretary
- Approved by committee on: 02/05/2018
- Next review date: 01/10/2018

#### Introduction

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

These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, Friends of the choir, business contacts and other people the group has a relationship with or regularly needs to contact.

This policy explains how these data should be collected, stored and used in order to meet Cappella's data protection standards and comply with the law.

#### Why is this policy important?

This policy ensures that Cappella Novocastriensis:

- 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

### Roles and responsibilities

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

This applies to *all* those handling data on behalf of Cappella Novocastriensis, e.g.:

- Committee members
- Employees and volunteers
- Members
- Contractors/3<sup>rd</sup>-party suppliers

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

- Name
- Email address
- Postal address
- Phone number
- Financial transactions pertaining to the choir, for example income from subscriptions, music hire / purchase or payment of legitimate expenses

## Roles and responsibilities

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

## Data controller

The Data Controller for Cappella Novocastriensis is Patrick Hazlehurst, Choir Chairman. They, together with the committee, who are also trustees of the charity, are responsible for explaining why data are collected and how they will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

## Data protection principles

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

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

- A member's name, voice, email address, postal address and telephone number/s, and membership category will be collected when they first join the group, and will be used to contact the member regarding group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including on their payment history for 'subs'.
- The name 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 group administration related to their role.
- Further information, including payment details and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).
- An individual's name and contact details will be collected when they make an online booking for an event via WeGotTickets. This will be used to contact them about their booking and to allow them entry to the event.
- 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 Cappella Novocastriensis to communicate with them about group activities, and/or for Direct Marketing. See 'Direct Marketing' below.

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

When collecting data, Cappella Novocastriensis will always explain to the subject why the data are required and what they 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 group 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 3rd parties without the explicit consent of the subject.

3. We ensure any data collected are relevant and not excessive

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

E.g. we need to collect telephone numbers from members in order to be able to contact them about group administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of group administration.

4. We ensure data are accurate and up-to-date

Cappella Novocastriensis will ask members, volunteers and staff 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 Data Controller.

5. We ensure data are not kept longer than necessary

Cappella Novocastriensis will keep data on individuals for no longer than 12 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records.

6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Data Controller:

- Members, volunteers and supporters can request to see any data stored about them. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can request that any inaccurate data held on them are updated. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the

request being made.

- Members and supporters can object to any storage or use of their data that might cause them substantial distress or damage or any automated decisions made based on their data. Any such objection will be considered by the committee, and a decision communicated within 30 days of the request being made

## 7. We keep personal data secure

Cappella Novocastriensis will ensure that data held by us are 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 leaves their role/position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard.
- Keys for locks securing physical data files should be collected by the Data Controller from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the group. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data

## 8. Transfer to countries outside the EEA

Cappella Novocastriensis will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (e.g. USA).

## Member-to-member contact

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

As a membership organisation Cappella Novocastriensis encourages communication between members.

To facilitate this:

- Members can request the personal contact data of other members in writing via the Data Controller or Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not

financial or health data) and the subject consents to their data being shared with other members in this way

## Direct Marketing

Cappella Novocastriensis will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities.

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

- A clear and specific explanation of what the data will be used for (e.g. *'Tick this box if you would like Cappella Novocastriensis 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.

## Cookies on the Cappella Novocastriensis 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.*

Cappella Novocastriensis uses cookies on our website <https://cappellanovocastriensis.com/> in order to monitor and record their 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 <https://cappellanovocastriensis.com/> 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 which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.