

Music at Duffield Data Protection Policy

SCOPE OF THE POLICY

This policy applies to the work of Music at Duffield. The policy sets out the requirements that Music at Duffield has to gather personal information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the Music at Duffield committee members to ensure that Music at Duffield is compliant.

For the purpose of this policy “members” includes both those people who have subscribed to season tickets for Music at Duffield and those who have asked to be included on the mailing list.

WHY THIS POLICY EXISTS

This data protection policy ensures that Music at Duffield:

1. Complies with data protection law and follows good practice.
2. Protects the rights of members.
3. Is open about how it stores and processes members’ data.
4. Protects itself from the risks of a data breach.

GENERAL GUIDELINES FOR COMMITTEE MEMBERS

1. The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of Music at Duffield.
2. Data must not be shared informally or outside Music at Duffield.
3. Music at Duffield will provide information to committee members to help them understand their responsibilities when handling personal data.
4. Committee Members who have access to members’ data should keep all data secure, by taking sensible precautions and following the guidelines below.
5. Personal data should not be shared outside Music at Duffield unless with prior consent and/or for specific and agreed reasons.
6. Member information should be reviewed and consent refreshed periodically.

DATA PROTECTION PRINCIPLES

The General Data Protection Regulation identifies 8 data protection principles:

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner.

Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

Principle 4 – Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.

Principle 5 – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

Principle 6 - Personal data must be processed in accordance with the individuals' rights.

Principle 7 - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Principle 8 - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

1. Lawful, fair and transparent data processing

Music at Duffield requests personal information from members for the purpose of sending communications about their involvement with Music at Duffield. The forms used to request personal information will contain a privacy statement informing members as to why the information is being requested and what the information will be used for. Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held. Members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a Music at Duffield member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken. The use of email or phone to communicate with any member is dependent on having the necessary consent.

2 Processed for Specified, Explicit and Legitimate Purposes

Members will be informed as to how their information will be used and the Committee of Music at Duffield will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

- Communicating with members about Music at Duffield events.

- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership.
- Music at Duffield will not send other marketing and/or promotional materials to members.

Music at Duffield will ensure that members' information is managed in such a way as to not infringe an individual member's rights.

3.Adequate, Relevant and Limited Data Processing

Members of Music at Duffield will only be asked to provide information that is relevant for membership purposes. This may include:

- Name.
- Postal address.
- Email address.
- Telephone number.
- Gift Aid entitlement.

There may be occasional instances where a member's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or Music at Duffield in these instances where Music at Duffield has a substantiated concern then consent does not have to be sought from the member.

4.Accuracy of Data and Keeping Data up to Date

Music at Duffield has a responsibility to ensure members' information is kept up to date. Members will be asked to let the membership secretary know if any of their personal information changes.

5.Accountability and Governance

The Music at Duffield Committee members are responsible for ensuring that Music at Duffield remains compliant with data protection requirements and can evidence that it has. For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance. The Music at Duffield Committee shall ensure that new members joining the Committee receive an induction into how data protection is managed within Music at Duffield and the reasons for this. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held. This will normally be done once a year.

6. Secure Processing

The committee members of Music at Duffield have a responsibility to ensure that data is both securely held and processed. This will include:

- Requesting that anyone who has access to personal data protects that data with a strong password.
- Not sharing passwords.
- Deleting personal data when it is no longer required.

7. Subject Access Request

Music at Duffield members are entitled to request access to the information that is held about them by Music at Duffield. The request needs to be received in the form of a written request to the Membership Secretary. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. Music at Duffield will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

8. Data Breach Notification

Were a data breach to occur action shall be taken to minimise the harm by ensuring all committee members are aware that a breach had taken place and how the breach had occurred. The committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The committee shall also contact the relevant Music at Duffield members to inform them of the data breach and actions taken to resolve the breach.

If a Music at Duffield member contacts Music at Duffield to say that they feel that there has been a breach by Music at Duffield, a committee member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the committee member will ask the Music at Duffield member to follow this up with an email or a letter detailing their concern. The concern will then be investigated by members of the committee who are not in any way implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.