

## **Hampstead Chorus**

### **Data Protection policy**

#### **Introduction**

For its effective operation, Hampstead Chorus needs to gather, store and use certain forms of information about individuals.

These can include members, those who sing with us, employees, 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 Hampstead Chorus's data protection standards and comply with the law.

#### **Why is this policy important?**

This policy ensures that Hampstead Chorus:

- Protects the rights of our members, those who sing with us, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect the group from the risks of a data breach

#### **Rules and responsibilities**

This policy applies to *all* those handling data on behalf of Hampstead Chorus, e.g.:

- Committee members
- Employees and volunteers
- Members and those who sing with us
- Contractors/3<sup>rd</sup>-party suppliers

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

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

#### **Roles and responsibilities**

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

#### **Data controller**

The Data Controller for Hampstead Chorus is Roger Pilgrim, Treasurer. He, together with the trustees, are responsible for why data is collected and how it will be used. Any questions relating to

the collection or use of data should be directed to the Data Controller.

## **Data projection principles**

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

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

- A member or singer's name and other relevant contact details 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' and other amounts paid to the group, for example, in relation to ticket purchases.
- 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 personal financial information 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 a booking for an event. 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 Hampstead Chorus 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, Hampstead Chorus will always explain to the subject why the data is required and what it 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 3<sup>rd</sup> parties without the explicit consent of the subject.

### **3. We ensure any data collected is relevant and not excessive**

Hampstead Chorus 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 and singers 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 is accurate and up-to-date**

Hampstead Chorus will periodically ask members, singers, volunteers and staff to check and update their data.

Any individual will be able to update their data at any point by contacting the Data Controller.

#### **5. We ensure data is not kept longer than necessary**

Hampstead Chorus 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, singers, volunteers and supporters can request to see any data stored on about them. Any such request will be actioned within 14 days of the request being made.
- Members, singers and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- Members, singers 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, singers 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 trustees, and a decision communicated within 30 days of the request being made

#### **7. We keep personal data secure**

Hampstead Chorus 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 leaves their role/position
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a secure place

- Any 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 record of who has access to data

## **8. Transfer to countries outside the EEA**

Hampstead Chorus 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 individual's data with other members or singers with the subject's prior consent.

As a membership organisation Hampstead Chorus encourages communication between members and singers. To facilitate this:

- Members and singers can request the personal contact data of other members in writing via the Data controller or Membership 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 and singers in this way

### **Direct Marketing**

Hampstead Chorus 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 is 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 Hampstead Chorus 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 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 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. It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies. All modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser.

Hampstead Chorus uses only cookies which are embedded in various third-party tools used to set up our website [www.hampsteadchorus.org.uk](http://www.hampsteadchorus.org.uk) to monitor and record visitors' activity as a group, so-called anonymous analytics cookies. These allows us to improve users' experience of our website by, for example, by giving us useful insight into how many individual users we have, and how often they visit the site. We use them to gather statistics, for example, the number of visits to a page, to help us identify if visitors would benefit from more information on a particular area of the website.

We have a pop-up box on [www.hampsteadchorus.org.uk](http://www.hampsteadchorus.org.uk) that will activate each new time a user visits the website. This allows users 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 also includes a link to this Privacy Policy.

Users should also be aware that some features of the website, for instance the sharing buttons for Facebook and Twitter, may result in cookies being set by these third parties, and used by them to track your online activity. Hampstead Chorus has no direct control over the information that is collected by these cookies.