

Data Protection Policy

OVERVIEW

Key details

- Policy prepared by: Martin Warren, Suzie Leech, Max Klatt
- Approved by committee on: 13/05/19
- To be reviewed annually

Introduction

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

These can include members, 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 Costanzi Consort data protection standards and comply with the General Data Protection Regulations (GDPR).

Why is this policy important?

This policy ensures that Costanzi Consort:

- 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 Costanzi Consort e.g.:
Committee members

- Employees and volunteers
- Members
- Contractors / Third Party suppliers

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

- Names

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

Roles and responsibilities

Costanzi Consort is the Data Controller and will determine what data is collected and how it is used. Our Data Protection Officer together with the committee, are responsible for the secure, fair and transparent collection and use of data by Costanzi Consort. Any questions relating to the collection or use of data should be directed to the Data Protection Officer costanziconsortdpo@gmail.com.

Everyone who has access to data as part of Costanzi Consort has a responsibility to ensure that they adhere to this policy.

Costanzi Consort uses third party Data Processors (e.g. Mail Chimp) to process data on its behalf. Costanzi Consort will take reasonable steps to ensure all Data Processors are compliant with GDPR.

DATA PROTECTION PRINCIPLES

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

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

- A member's name and 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 their payment history for 'subs'. Where possible Costanzi Consort will anonymise this data.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Costanzi Consort completing tasks expected as part of the individual's membership).
- The name and contact details of volunteers, 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).

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Costanzi Consort completing tasks expected as part of working with the individuals).
- 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.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Costanzi Consort completing tasks expected as part of the booking).
- 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 Costanzi Consort to communicate with them about and promote group activities. See 'How we get consent from Supporters' below.
 - Lawful basis for processing this data: Consent (see 'How we get consent')
- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the Costanzi Consort website' below.
 - Lawful basis for processing this data: Consent (see 'How we get consent from Supporters')

b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those purposes specified.

When collecting data Costanzi Consort 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. Printed copies of any such agreement will be made available at Costanzi Consort concerts and fundraising events.

c) We ensure any data collected is relevant and not excessive

Costanzi Consort 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.

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

Costanzi Consort 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 Protection Officer.

e) We ensure data is not kept longer than necessary

Costanzi Consort 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 in line with Costanzi Consort Data Retention Policy.

When the intended use is no longer applicable the data will be deleted within a reasonable period unless consent has been given to retention.

f) We keep personal data secure

Costanzi Consort will ensure that data held by us is kept secure.

- All reasonable steps will be taken to ensure any electronically-held data is held within a password-protected and secure environment
- Access to electronic data files will be rescinded and passwords reset each time an individual with access to data leaves their role/position
- Costanzi Consort may hold physical data (e.g. membership forms or email sign-up sheets) which will be stored securely. Any such information and physical forms will be transferred securely each time an individual with access to the data 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 Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data

g) Transfer to countries outside the EEA

Costanzi Consort will take all reasonable measures and the necessary due diligence to ensure that data is not knowingly transferred to countries outside the EEA unless the country has adequate protection for the individual's data privacy rights.

INDIVIDUAL RIGHTS

When Costanzi Consort collects, holds and uses an individual's personal data that individual has the following rights over that data. Costanzi Consort 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.

Individual's rights

- **Right to be informed:** whenever Costanzi Consort collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used. Printed copies of this statement will be made available when collecting data at Costanzi Consort concerts and events.
- **Right of access:** individuals can request to see the data Costanzi Consort holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- **Right to rectification:** individuals can request that their data be updated where it is inaccurate or incomplete. Costanzi Consort will request that members, staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- **Right to object:** individuals can object to their data being used for a particular purpose. Costanzi Consort will always provide a way for an individual to withdraw consent in all marketing communications. Where any audio or visual recording is being undertaken, Costanzi Consort will provide clear and advance notice, and individuals will be given time and means to object. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- **Right to erasure:** individuals can request for all data held on them to be deleted. Costanzi Consort data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request 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.
- **Right to restrict processing:** individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, Costanzi Consort will restrict the data while it is verified).

Though unlikely to apply to the data processed by Costanzi Consort we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

MEMBER TO MEMBER CONTACT

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

As a membership organisation Costanzi Consort encourages communication between members.

To facilitate this:

- Members can request the personal contact data of other members in writing, by email or by telephone via the Data Protection Officer 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, but not financial or health data) and the subject has consented to their data being shared with other members in this way

HOW WE GET CONSENT FROM SUPPORTERS

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

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

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Costanzi Consort to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')
- Access to a copy of this Data Protection Policy, either in digital or printed form

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 3rd-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.

Costanzi Consort will occasionally make video or audio recordings of rehearsals, concerts and fundraising events for promotional purposes. Clear notices will be displayed when this is occurring, and individuals will be given the opportunity to inform the Data Protection Officer or the Committee to withdraw consent to be recorded.

COOKIES ON THE COSTANZI CONSORT 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.

Costanzi Consort uses cookies on our website www.costanziconsort.org.uk 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 have a pop-up box on www.costanziconsort.org.uk that will activate each new time a user visits the website. This will allow them to click to consent (or not) to continue with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent).