**Introduction**

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In order to operate *Crosby Community Choir* needs to gather, store and use certain forms of information about individuals. These can include members, 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 *Crosby Community Choir’s* data protection standards and comply with the General Data Protection Regulations (GDPR). Since 1 January 2021, it is now called the United Kingdom GDPR (UKGDPR)

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**Why is this policy important?**

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This policy ensures that *Crosby Community Choir*:

* 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.

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

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It applies to all those handling data on behalf of *Crosby Community Choir*, for example:

* Volunteers
* Members
* Contractors/3rd-party suppliers

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It applies to all data that *Crosby Community Choir* holds relating to individuals, including:

* Names
* Email addresses
* Postal addresses
* Phone numbers
* Any other personal information held.

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**Roles and responsibilities**

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*Crosby Community Choir* is the Data Controller and will determine what data is collected and how it is used. The functions of the Data Protection Officer for *Crosby Community Choir* are split between the Director of Music, the Membership Secretary, and the Publicity Officer for marketing and publicity.  They are responsible for the secure, fair, and transparent collection and use of data *Crosby Community Choir*. Any questions relating to the collection or use of data should be directed to the appropriate Data Protection Officer. Everyone who has access to data as part of *Crosby Community Choir* has a responsibility to ensure that they adhere to this policy.

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**Data protection principles**

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**A. We fairly and lawfully process personal data in a transparent way**

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*Crosby Community Choir* will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

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* A member’s name, address, email and contact phone numbers will be collected when they first join the choir and will be used to contact the member regarding choir membership administration and activities. Where possible *Crosby Community Choir* will anonymise this data  
  -  Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to *Crosby Community Choir* completing tasks expected as part of the individual’s membership).

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* The name and contact details of volunteers 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 *Crosby Community Choir* completing tasks expected as part of working with the individuals).

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* 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 *Crosby Community Choir* completing tasks expected as part of the booking).

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* 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 *Crosby Community Choir* to communicate with them about and promote group activities. See ‘How we get consent’ below.  
  - Lawful basis for processing this data: Consent (see ‘How we get consent’)

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

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When collecting data, *Crosby Community Choir* 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.

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

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*Crosby Community Choir* will not collect or store more data than the minimum information required for its intended purpose.

For example, 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.

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

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*Crosby Community Choir* will ask members, volunteers and staff to check and update their data on a biannual basis. Any individual will be able to update their data at any point by contacting the membership secretary.

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**E. We ensure data is not kept longer than necessary**

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*Crosby Community Choir* 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 *Crosby Community Choir* data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

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**F. We keep personal data secure**

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*Crosby Community Choir* will ensure that data held by us is kept secure.

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* 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.
* Access to data will only be given to relevant trustees/committee members 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.

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**G. Transfer to countries outside the EEA**

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*Crosby Community Choir* will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual’s data privacy rights.

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**Individual Rights**

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When *Crosby Community Choir* collects, holds and uses an individual’s personal data that individual has the following rights over that data.

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* The right to be informed about what data we are collecting on you and how we will use it.

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* The right of access - you can ask to see the data we hold on you.

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* The right to rectification - you can ask that we update or correct your data.

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* The right to object - you can ask that we stop using your data for a particular purpose.

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* The right to erasure - you can ask us to delete the data we hold on you.

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* The right to restrict processing - you can ask that we temporarily stop using your data while the reason for its use or its accuracy are investigated.

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* Though unlikely to apply to the data we hold and process on you, you also have rights related to portability and automated decision making (including profiling)

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*Crosby Community Choir* 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.

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**H. How we get consent**

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*Crosby Community Choir* 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 group activities.

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

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* A method for users to show their positive and active consent to receive these communications (e.g. a ‘tick box’)

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* A clear and specific explanation of what the data will be used for (e.g. ‘Tick this box if you would like *Crosby Community Choir* to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved’)

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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.

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**Review Date**

This policy is reviewed every 2 years.

Last review was on 1st September, 2023

**The legal basis for using personal data is: the legitimate Interest for all information except for:**

* Your photograph, in printed form, video or on our website,
* Your name appearing in choir concert programmes, video or on our website,

In these cases, assumed consent is the legal basis governing the retention and use of these items of personal data, which can be freely given or withheld. Please inform the Membership Secretary if you wish to withdraw consent for such use of your image or name.