

Kingston Choral Society

Data Protection Policy

Overview

Key details

- Policy prepared by: Gerry Dawson (former Chair)
- Approved by KCS Committee on: 07/11/2022
- Next review date: October 2023
- Please refer to the "KCS Data Audit" document for a list of all data held

Introduction

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

These can include members, contractors, suppliers, volunteers, audiences and potential audiences, members of any Friends group, 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 KCS's data protection standards and comply with the law.

Why is this policy important?

This policy ensures that KCS:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect 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 KCS, e.g.:

- Committee members
- Volunteers
- Members
- Contractors/3rd-party suppliers

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

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

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

Data controller

The Data Controller for KCS is the KCS Committee. They are responsible for determining which 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 protection principles

1. We fairly and lawfully process personal data

KCS 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 on their payment history for 'subs'.
- The name and contact details of volunteers, committee members 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 Disclosure and Barring Service for example).

- An individual's name and contact details may 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 KCS to communicate with them about group activities, and/or for Direct Marketing. See 'Direct Marketing' below.
- An individual's name, contact details and other details may be collected in connection with the KCS "100" Club, with their consent, in order for KCS to manage the activities of the club.

- An individual's name, contact details and other details may be collected in connection with the operation of any "Friends" scheme, with their consent, in order for KCS to manage the activities of the scheme.

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

When collecting data, KCS will always explain to the subject why the data is required and what it will be used for, e.g.

"Members' names and addresses are kept on a computer file. We need this so that we can send you updates including emails about rehearsal and concert schedules, subs payments and other business."

We will never use data for any purpose other than that stated, unless it 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 is relevant and not excessive

KCS 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 is accurate and up-to-date

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

Retiring Members sometimes choose to remain in touch with old friends at KCS, so we keep their contact details on file. If a Member asks us to remove their details from the Membership list, we will do so within 28 days, 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 on about them. Any such request will be actioned within 28 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 28 days of the request being made.

- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 28 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. Any such objection will be considered by the trustees, and a decision communicated within 28 days of the request being made

7. We keep personal data secure

KCS will treat personal data with care and respect.

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.

On appointment, trustees/Committee members/contractors will receive a copy of this Policy as a means of instruction regarding their data protection responsibilities. When they leave their post or complete their work, trustees/Committee members/contractors are required to delete any KCS-related personal data that they have held on their own equipment or in their own paper files in order to carry out their role.

The Committee will review this Policy annually and review an updated audit of the data currently being held by KCS.

Member-to-member contact

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

As a membership organisation KCS encourages communication between members.

To facilitate this:

- Members 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 in this way

Direct Marketing

KCS might occasionally 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 KCS 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 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 28 days.

Cookies on the KCS 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. Cookies that our own website sets are called first party cookies, and those set by other websites who run content on our website are known as third party cookies – for example Facebook sets cookies via our website if somebody 'likes' one of the posts on our site. Currently the KCS website only uses third party cookies.

KCS may in future use cookies on our website, kingstonchoralsociety.org.uk in order to monitor and record activity. This would allow 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 would implement a pop-up box that would activate each new time a user visited the website. This would 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).