

Putney Choral Society

Data Protection and Retention Policy

21st May 2018

Introduction

This policy explains how Putney Choral Society (“PCS” or “we”) manages data related to members and other individuals in order to comply with the General Data Protection Regulations (GDPR). The purpose is:

- to protect the rights of our members and supporters;
- to comply with data protection law and follow good practice;
- to protect the group from the risks of a data breach;

The policy applies to all those who handle data on behalf of the choir.

Roles and responsibilities

The committee of PCS is the Data Controller (as defined in GDPR) and will determine what data is collected and how it is used. The Data Protection Officer for PCS is Geoff Chapman.

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

Principles

We collect data where lawful and where it is necessary for the legitimate purposes of the group. These legitimate purposes are:

- A member’s name and contact details will be collected when they first join the choir, and will be used to contact the member regarding choir activities. Other data may also be collected in relation to membership, including payment history for subscriptions and the provision of musical scores. This purpose is called “membership administration”.
- A member’s email address may be used with their consent, so that we can provide information about other musical events that may be of interest. This purpose is called “events communication”.
- Email addresses for past members of the choir and other members of the general public may be used with their consent so that we can provide information about upcoming planned performances in case they wish either to join the choir to sing with us or to attend the performance. This purpose is called “marketing communication”.

We do not collect more data than is necessary to achieve these legitimate purposes.

We 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).

We keep data secure. Data is held electronically within a password protected and secure environment. Access to data is only given to members where it is necessary for the running of the choir.

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Data will never be shared with any third party, other than for the purpose of fulfilling one of the legitimate purposes described above.

How we get consent

Where data is collected for the marketing communications which require consent we will provide:

- A method for users to show their positive and active consent to receive these communications
- A clear and specific explanation of what the data will be used for

Data collected will only ever be used in the way described and consented.

Individual's rights

Members can ask to see the data we hold on them and for confirmation of how it is being used. Such requests should be made via email to the Data Protection Officer.

Members can request that the membership administration data that we hold on them be deleted. However in such an eventuality it is not possible to continue as a member of the choir since such data is essential to our operation.

Individuals can withdraw consent at any time from receiving events or marketing communications by replying to such an email stating consent is withdrawn.

Data retention

A regular review of all data will take place to establish whether PCS still has good reason to keep and use the data held at the time of the review.

As a general rule such data reviews will be held every two years. The last review was conducted on 21st May 2018.

When a member leaves the choir any data held on them will be deleted within two years of their membership lapsing.