



# THREE SPIRES SINGERS

Website: [www.threespiressingers.org.uk](http://www.threespiressingers.org.uk)

Registered office: Oak Farm, Carnon Downs, TRURO TR3 6LJ, Cornwall.

Registered Charity No. 900017

## Data Protection policy

- Policy prepared by: Simon Price
- Approved by Board/committee on: 08/05/2018
- Next review date: 31/05/2019

### Introduction

In order to operate, Three Spires Singers 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 is collected, stored and used in order to meet Three Spires Singers' data protection standards and comply with the law.

### Why is this policy important?

This policy ensures that Three Spires Singers:

- 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

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

This applies to *all* those handling data on behalf of Three Spires Singers, e.g.:

- Committee members
- Volunteers
- Members
- Contractors/3<sup>rd</sup>-party suppliers

It applies to all data that Three Spires Singers holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other information held (e.g. financial)
- Individually identifiable photographs and video footage

## Roles and responsibilities

*Everyone* who has access to data as part of Three Spires Singers has a responsibility to ensure that they adhere to this policy.

*The Data Controller* for Three Spires Singers is Simon Price (Hon. Treasurer). He, together with the Three Spires Singers Committee, is responsible for why data is collected and how it will be used, and to maintain a Data Register. Any questions relating to the collection or use of data should be directed to the Data Controller: [data@threespiressingers.org.uk](mailto:data@threespiressingers.org.uk).

## PRINCIPLES

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

Three Spires Singers 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 subscriptions.
- The name and contact details of committee members, volunteers, contracted performers (e.g. orchestral players, soloists), and commercial contractors will be collected when they are first associated with Three Spires Singers, and will be used to contact them regarding group administration related to their role.
- An individual's name and contact details will be collected when they make a booking directly with Three Spires Singers for a concert or other 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 that Three Spires Singers can communicate with them about group activities, and/or for Direct Marketing. See 'Direct Marketing' below.
- Photos and video footage: individuals will not usually be personally identified but we do use photos and video footage of the activities of the choir, orchestra and soloists for promoting concerts and fund-raising. If any individual in a photograph or video clip is identified, their consent will have been given before use.

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

When collecting data, Three Spires Singers will always explain to the subject why the data is required and what it will be used for.

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

Three Spires Singers will not collect or store more data than the minimum information required for its intended purpose.

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

Three Spires Singers 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 Controller.

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

Three Spires Singers 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 (for example, a record of subscriptions within our financial records, which are kept for 6 years according to current HMRC rules).

#### **6. We process data in accordance with individuals' rights**

The following requests can be made to the Data Controller - Those concerned can.....

- request to see any data stored on about them. Any such request will be actioned within 14 days of the request being made.
- request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the request being made.
- 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 Committee, and a decision communicated within 30 days of the request being made

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

Three Spires Singers will ensure that data held by us is kept secure.

Electronically-held data will be held within a password-protected and secure environment. Anyone who records any contact details must ensure this happens. Various members of the TSS Committee store the data, mostly digitally, according to their roles in running the choir.

- 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 locked cupboard.
- 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 master-list of who has access to data.

## MEMBER-TO-MEMBER CONTACT

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

Group email messages to TSS members will not include commercial marketing or charitable appeals from individual members, unless decided otherwise by the Committee, who would then try to ensure that such material is not excessive or irrelevant.

An exceptional request from a TSS member might be considered as a special case. Requests for messages to be sent to our database appealing for a member's personal-interest fund-raising will not usually be granted.

## SHARING DATA WITH THIRD PARTIES

Three Spires Singers will not share contact data with **third parties**.

## DIRECT MARKETING

Three Spires Singers may collect data from concert ticket buyers who have given their consent to us or the ticket-selling agency (currently Hall for Cornwall), for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities.

At any time that data is collected for this purpose, we or our agent will provide:

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

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”

*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.*

Our website [www.threespiressingers.org](http://www.threespiressingers.org) uses Google Analytics cookies to obtain metrics about visitors to the site: nothing is identifiable personally.

We will implement a pop-up box on [www.threespiressingers.org](http://www.threespiressingers.org) that will activate each new time a user visits the website. This will 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).

It will also include a link to our Privacy Policy which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.