

INTRODUCTION

In order to operate, Sheffield Bach Society (SBS) needs to gather, store and use certain forms of information about individuals. This 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 will be collected, stored and used in order to meet SBS data protection standards and comply with the General Data Protection Regulations.

Why is this policy important?

This policy ensures that SBS:

- 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 SBS e.g.:

- Committee members
- Employees and volunteers
- Members
- Contractors/3rd-party suppliers

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

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

Roles and responsibilities

SBS is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer is the current Chairman. SBS, who, together with the Committee, is responsible for the secure, fair and transparent collection and use of data by SBS. Any questions relating to the collection or use of data should be directed to the Chairman. *Everyone* who has access to data as part of SBS has a responsibility to ensure that they adhere to this policy

DATA PROTECTION PRINCIPLES

We fairly and lawfully process personal data in a transparent way

- SBS 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 subscriptions. Where possible SBS will anonymise this data.
- The name and contact details of contractors will be collected when engaged by the society and will be used to contact them regarding their role. Further information, including personal

financial information and criminal records information may also be collected where lawful and necessary in order to process payment to the person or in order to carry out a DBS check.

- 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.
- An individual's name, contact details and other details may be collected at any time with their consent, in order for SBS to communicate with them about and promote group activities
- SBS does not track or collect any data on individuals accessing the Society's website
- When communicating with multiple recipients, the society will always utilise 'blind copy'

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

When collecting data, SBS will explain why the data is required and what it will be used for.

We ensure any data collected is relevant and not excessive

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

We ensure data is accurate and up-to-date

SBS will ask members and individuals on the society's mailing list, to check and update their data on an annual basis. Any individual including contractors will be able to update their data at any point by contacting the Secretary or Data Protection Officer.

We ensure data is not kept longer than necessary

SBS 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 SBS 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.

We keep personal data secure

SBS will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Physically-held data (e.g. membership forms, contracts for services) will be stored securely
- If an individual holding electronic data on behalf of the society, leaves their role/position, then all data will be passed to the Data Protection Officer and deleted from the individual's device
- If an individual holding physical data files leaves their role/position, all files will be passed to the Data Protection Officer
- 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

INDIVIDUAL RIGHTS

When SBS collects, holds and uses an individual's personal data that individual has the following the rights over that data. SBS 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 SBS collects data it will explain why it is being collected and how it will be used and/or provide a link to this policy on the society's website
- **Right of access:** individuals can request to see the data SBS 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. SBS will request that members and those who have agreed to be on mailing lists, check and update their data on an annual basis. Any requests for data e.g. on contractors to be updated, will be processed within one month.
- **Right to object:** individuals can object to their data being used for a particular purpose. SBS will provide a way for an individual to withdraw consent in all marketing communications. 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. SBS 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 and/or there is a legal requirement to keep the data.
- **Right to restrict processing:** individuals can request that their personal data be 'restricted' i.e., retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, SBS will restrict the data while it is verified). Though unlikely to apply to the data processed by SBS 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. Members can request the personal contact data of other members in writing via the Data Protection Officer or Secretary. These details will be given, as long as they are for the purposes of contacting the subject and the subject has consented to their data being shared with other members in this way.

HOW WE GET CONSENT

SBS will collect data from consenting supporters for marketing purposes from time to time. This includes contacting them to promote performances, updating them about group news, fundraising and other group activities. Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications
- A clear explanation of what the data will be used for (e.g. new text from 2018-19 brochure to consent to receive information about our concerts)

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). Marketing communication will contain a method through which a recipient can withdraw their consent. Opt-out requests such as this will be processed within 14 days.

COOKIES ON THE SBS 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. Whilst SBS uses cookies on our website www.sheffieldbachchoir.org.uk to facilitate its efficient operation, the Society does not monitor or record visitor's activity.

DATA RETENTION POLICY

INTRODUCTION

This policy sets out how SBS will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of SBS Data Protection Policy.

ROLES AND RESPONSIBILITIES

SBS is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for SBS is the current Chairman, who, together with the Committee is responsible for the secure and fair retention and use of data by SBS. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

REGULAR DATA REVIEW

A regular review of all data will take place to establish if SBS still has good reason to keep and use the data held at the time of the review. As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review.

Data to be reviewed

- SBS stores data on digital documents (e.g. spreadsheets) stored on personal devices held by the Officers of the Society i.e. Chairman, Secretary and Treasurer
- Physical data stored at the homes of Officers as above

Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other committee members to be decided on at the time of the review.

How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally with priority will be given to any instances where data is stored in active lists and to sensitive data.
- Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data? This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised?	Anonymise data	Continue to use

Statutory Requirements

Date stored by SBS may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Gift Aid declarations records
- Details of payments made and received (e.g. in bank statements and accounting records)
- Trustee meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details
- Tax and employment records

OTHER DATA RETENTION PROCEDURES

Member data

- When a member leaves SBS and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted. Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review

Contractor data

- When a contractor stops working with SBS and all administrative tasks relating to their work have been completed, any potentially sensitive data held on them will be deleted, unless consent has been given to retain the data for potential use in the future
- All other data will be stored safely and securely and reviewed as part of the next two year review

Other data

- All other data will be included in a regular two year review

Policies prepared using the templates provided by *Making Music*

Approved by the Committee of Sheffield Bach Society on 17th May 2018

To be reviewed bi-annually, next review date May 2020