

# **DATA PRIVACY POLICY - Towcester Choral Society (TCS)**

## **1. Personal Data – what is it?**

Personal Data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the Data Controller's possession or likely to come into such possession. The processing of Personal Data is governed by the General Data Protection Regulation (the "GDPR").

## **2. Who are we?**

The Towcester Choral Society (TCS) is the Data Controller. This means TCS decides how Personal Data is processed and for what purposes.

## **3. How does TCS process Personal Data?**

TCS complies with its obligations under the GDPR by:

- keeping Personal Data up to date;
- storing and destroying it securely;
- not collecting or retaining excessive amounts of data;
- protecting Personal Data from loss, misuse, unauthorised access and disclosure.

TCS uses Personal Data for the following purposes:

- To provide a service for the benefit of our members and the local community as specified in our constitution;
- To administer membership records, and for the welfare of the members;
- To fundraise and promote the interests of the charity;
- To manage contractors and volunteers;
- To maintain TCS' own accounts and records (including the processing of gift aid applications);
- To inform members about news, events, activities which the TCS Committee believe may be of interest to them;
- To share members' email addresses with John Fletcher Music so it can provide them with a log-in to access rehearsal materials;
- To use photos or videos taken at TCS events in publicity materials;
- To enable administrative contact with people booking tickets for TCS events

## **4. What is the legal basis for processing your Personal Data?**

TCS obtains consent from members so that TCS can keep them informed about news, events, activities and services, to share their email addresses with John Fletcher Music, and to use photos or videos taken at TCS events in publicity materials. TCS processes gift aid donations in accordance with its legal obligation.

By exception it may be necessary to process information about a member's health condition. In this event an additional specific consent will be obtained from the member concerned.

TCS processes data regarding contractors and volunteers to pay their fees and expenses according to the contract between TCS and the contractor or volunteer.

TCS processes data regarding people who book tickets for TCS events in accordance with the contract between TCS and the ticket booker. TCS may keep a ticket booker informed about TCS news, events, activities and services on the basis of legitimate interest.

The processing carried out by TCS relates to members, former members, contractors and volunteers, and people who book tickets for TCS events. There is no disclosure to a third party without consent.

## **5. Sharing Personal Data**

Personal Data will be treated as strictly confidential. Members can request the personal contact data of another member for purposes connected with TCS, but these data will only be given if the subject has given their permission.

TCS will only share members' data with other third parties with consent. Data regarding people who book tickets for TCS events will not be shared with third parties.

## **6. How long does TCS keep Personal Data?**

TCS keeps a member's Personal Data while they remain a member, and until all TCS materials are returned when a member leaves.

Gift aid declarations and associated paperwork are retained for up to 6 years after the calendar year to which they relate.

Data for people who book tickets for TCS events is retained for 2 years after their last booking.

## **7. Your rights and your Personal Data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your Personal Data:

- The right to request a copy of the Personal Data which TCS holds about you;
- The right to request that TCS corrects any Personal Data if it is found to be inaccurate or out of date;
- The right to request that your Personal Data is erased where it is no longer necessary for TCS to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the Data Controller provide you with your Personal Data and, where possible, to transmit that data directly to another Data Controller;
- The right, where there is a dispute in relation to the accuracy or processing of your Personal Data, to request a restriction is placed on further processing;
- The right to object to the processing of Personal Data;
- The right to lodge a complaint with the Information Commissioners Office.

## **8. Further processing**

If TCS wishes to use Personal Data for a new purpose not covered by this Data Privacy Policy, then TCS will provide a new Policy explaining the new use prior to commencing the processing, and setting out the relevant purposes and processing conditions. Where appropriate TCS will seek prior consent to the new processing.

## **9. Contact Details**

To exercise all relevant rights, queries or complaints please in the first instance contact the TCS Data Protection Officer.