

# **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, contractors, volunteers, supporters and the local community as specified in our constitution;
- 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 and others about news, events, activities which the TCS Committee believe may be of interest to them;
- 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 Personal Data?**

- Where there is a legitimate interest to use people's data in ways they would reasonably expect, and which have a minimal privacy impact.
- Where processing is necessary to satisfy legal obligations.
- By consent from members to use photos or videos taken at TCS events in publicity materials.
- By consent where members' Personal Data is disclosed to a third party.
- According to a contract between TCS and a person.
- By exception it may be necessary to process information about a person's health condition. In this event specific consent will be obtained from the person concerned.

## **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 other member has given their permission.

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

- TCS keeps a member's Personal Data while they remain a member in accordance with the society's rules.
- Data for former, lapsed, or pending members, is retained for 2 years after their last activity.
- Data for supporters who book tickets for TCS events is retained for 2 years after their last booking.
- Data for contractors and volunteers will be retained for 2 years after their last activity with TCS.
- Gift aid declarations and associated paperwork are retained for up to 7 years after the calendar year to which they relate.

## **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 consent to 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, TCS will provide a new Policy explaining the new use. 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.