

# VIGO SINGERS – DATA PROTECTION POLICY

## OVERVIEW

### Key details

Policy prepared by: Vigo Singers

Approved by Committee on: 7<sup>th</sup> August 2018

Next review date: August 2019

### Introduction

In order to operate, Vigo Singers needs to gather, store and use certain forms of information about individuals.

These can include members, employees, volunteers, and other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Vigo Singers' data protection standards and comply with the General Data Protection Regulations (GDPR) which came into effect on 25 May 2018.

### Why is this policy important?

This policy ensures that Vigo Singers:

- Protects the rights of our members and supporters
- Complies with data protection law and follows good practice
- Takes all reasonable measures to 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 Vigo Singers e.g.:

- Committee members
- Employees
- Members

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

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

### Responsibilities

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

Having reviewed the GDPR we believe that we do not need to appoint a data protection officer at this time but we have shared responsibility.

## **DATA PROTECTION PRINCIPLES**

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

Vigo 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.
- The name and contact details of employees will be collected when they take up a position and will be used to contact them regarding group administration related to their role.
- Further information may also be collected in specific circumstances 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 may be collected when they make a booking for an event. This will be used to contact them about the booking.

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

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

*"Please enter your email address in the form below. We need this so that we can send you email updates for group administration including about rehearsal and concert schedules, subs payments and other business."*

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 3rd parties without the explicit consent of the subject.

### **3. We ensure any data collected is relevant and not excessive**

Vigo 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**

Vigo Singers will ask members and staff to check and update their data on an annual basis. We aim to do this in September (the start of the academic year.) Any individual will be able to update their data at any point by contacting the Chairman or another committee member.

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

Vigo 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.

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

The following requests can be made in writing to the Chairman (or another committee member in the Chairman's absence):

- Members, volunteers and supporters can request to see any data stored about them. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the request being made.

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

Vigo Singers will take reasonable precautions to ensure that data is kept securely. Any communication via email will be password secured.

Access to data will only be given to relevant members where it is clearly necessary for the running of the group.

We keep members names, addresses, email address and phone numbers electronically.

We keep additional information e.g. health details and next of kin as written copy. This is kept in a file which is held by the Chairman and a duplicate held by another nominated committee member.

We keep some financial information electronically and sometimes as printed copy, so that the Treasurer and other relevant committee members can carry out duties including making payments to employees and organisations.

## **MEMBER TO MEMBER CONTACT**

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

As a membership organisation Vigo Singers encourages communication between members.

To facilitate this members can request the personal contact data of other members by asking the Chairman or a committee member. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject consents to their data being shared with other members in this way.

Policy reviewed by SD 26 October 2020 and agreed by the Committee on 27 October 2020