

# HARMONIA SACRA

MUSICAL DIRECTOR: PETER LEECH

## Data Protection Policy

### OVERVIEW

#### Key details

- Policy prepared by: Suzie Leech, Peter Leech
- Approved on: 14/05/2018
- To be reviewed annually

#### Introduction

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

These individuals can include Harmonia Sacra singers, 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 should be collected, stored and used in order to meet Harmonia Sacra's data protection standards and comply with the General Data Protection Regulations (GDPR).

#### Why is this policy important?

This policy ensures that Harmonia Sacra

- Protects the data protection rights of individuals
- 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 Harmonia Sacra e.g.:

- Employees and volunteers
- Harmonia Sacra singers
- Contractors / Third Party suppliers

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

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

## Roles and responsibilities

Harmonia Sacra is the Data Controller and will determine what data is collected and how it is used. Our Data Protection Officer together with the Musical Director, is responsible for the secure, fair and transparent collection and use of data by Harmonia Sacra. Any questions relating to the collection or use of data should be directed to the Data Protection Officer [harmoniasacra@gmail.com](mailto:harmoniasacra@gmail.com)

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

Harmonia Sacra uses third party Data Processors (e.g. Mail Chimp) to process data on its behalf. Harmonia Sacra will take reasonable steps to ensure all Data Processors are compliant with GDPR.

## DATA PROTECTION PRINCIPLES

### a) We fairly and lawfully process personal data in a transparent way

Harmonia Sacra will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A singer's name and contact details will be collected when they first join the group, and will be used to contact them regarding group membership administration and activities. Other data may also subsequently be collected in relation to musical activities of the group. Where possible Harmonia Sacra will anonymise this data.
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Harmonia Sacra completing tasks expected as part of the individual's participation in Harmonia Sacra related activities).
- The name and contact details of volunteers, employees and contractors 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, including personal financial information and criminal records 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).

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Harmonia Sacra completing tasks expected as part of working with the individuals).
- 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 and to allow them entry to the event.
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Harmonia Sacra completing tasks expected as part of the booking).
- 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 for Harmonia Sacra to communicate with them about and promote group activities. See 'How we get consent from Supporters' below.
  - Lawful basis for processing this data: Consent (see 'How we get consent')

- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the Harmonia Sacra website' below.
  - Lawful basis for processing this data: Consent (see 'How we get consent from Supporters')

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

When collecting data Harmonia Sacra will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

**c) We ensure any data collected is relevant and not excessive**

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

E.g. we need to collect telephone numbers from the group's singers in order to be able to contact them about group administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of group administration.

**d) We ensure data is accurate and up-to-date**

Harmonia Sacra will ask singers, volunteers and staff to check and update their data on a bi-annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer.

**e) We ensure data is not kept longer than necessary**

Harmonia Sacra 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 Harmonia Sacra Data Retention Policy. When the intended use is no longer applicable the data will be deleted within a reasonable period unless consent has been given to retention.

**f) We keep personal data secure**

Harmonia Sacra will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Passwords to access electronic data files will be re-set each time an individual with data access leaves their role/position
- Harmonia Sacra may hold physical data (e.g. membership forms or email sign-up sheets) which will be stored securely
- 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

**g) Transfer to countries outside the EEA**

Harmonia Sacra will not transfer data to countries outside the EEA unless the country has adequate protection for the individual's data privacy rights.

## INDIVIDUAL RIGHTS

When Harmonia Sacra collects, holds and uses an individual's personal data that individual has the following the rights over that data. Harmonia Sacra 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 Harmonia Sacra collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- **Right of access:** individuals can request to see the data Harmonia Sacra 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. Harmonia Sacra will request that members, staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- **Right to object:** individuals can object to their data being used for a particular purpose. Harmonia Sacra will always 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. Harmonia Sacra 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.
  - There is a legal requirement to keep the data.
- **Right to restrict processing:** individuals can request that their personal data be 'restricted' - that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, Harmonia Sacra will restrict the data while it is verified).

Though unlikely to apply to the data processed by Harmonia Sacra we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

## CONTACT BETWEEN HARMONIA SACRA SINGERS

We only share a Harmonia Sacra singer's data with other singers in the group with the subject's prior consent.

As an organisation Harmonia Sacra encourages communication between its singers.

To facilitate this:

- Singers can request the personal contact data of other singers in writing, by email or by telephone via the Data Protection Officer or Musical Director. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address, but not financial or health data) and the subject has consented to their data being shared with other members in this way

## **HOW WE GET CONSENT FROM SUPPORTERS**

Harmonia Sacra will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about group news, fundraising and other activities.

When data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Harmonia Sacra to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

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).

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 ON THE Harmonia Sacra 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.

Harmonia Sacra uses cookies on our website [www.harmoniasacra.co.uk](http://www.harmoniasacra.co.uk) in order to monitor and record their activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

We have a pop-up box on [www.harmoniasacra.co.uk](http://www.harmoniasacra.co.uk) 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).

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# Data Retention Policy

## OVERVIEW

### Introduction

This policy sets out how Harmonia Sacra will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of Harmonia Sacra Data Protection Policy.

### Roles and responsibilities

Harmonia Sacra is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer together with its Musical Director, Peter Leech are responsible for the secure and fair retention and use of data by Harmonia Sacra. Any questions relating to data retention or use of data should be directed to the Data Protection Officer ([harmoniasacra@gmail.com](mailto:harmoniasacra@gmail.com)).

## REGULAR DATA REVIEW

A regular review of all data will take place to establish if Harmonia Sacra 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. The first review was undertaken in May 2018.

### Data to be reviewed

- Harmonia Sacra stores data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members and volunteers assisting the Committee.
- Data stored on third party online services (e.g. Google Drive, Mail Chimp, Dropbox)
- Physical data stored at the homes of committee members

### Who the review will be conducted by

The review will be conducted by the Data Protection Officer

### 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.
  - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) 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 seek 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	Seek consent
Can the data be anonymised	Anonymise data	Continue to use

## Statutory Requirements

Data stored by Harmonia Sacra may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

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

## OTHER DATA RETENTION PROCEDURES

### Harmonia Sacra singer's data

- When a singer leaves Harmonia Sacra, all administrative tasks relating to them benign singer in the group will have been completed, and 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

### **Volunteer and Freelancer data**

- When a volunteer or freelancer stops working with Harmonia Sacra and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted - this might include bank details or medical data
- 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

### **Other data**

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

**END**