

MUSIC IN FELIXSTOWE

Approved version

DATA PROTECTION POLICY

Approved by the Trustees on 26 June 2018 to take effect from 26 June 2018 and be reviewed by the Trustees after one year (and no later than 18 months) and subsequently thereafter.

This Policy shall comply with the General Data Protection Regulations (GDPR) 2018 and as subsequently amended.

The Trustees of Music in Felixstowe shall each be provided with a copy of the current Policy, shall be familiar with its contents, be aware of its likely impact on the organisation and identify areas that could cause compliance problems under the GDPR.

1. As a Registered Charity, Music in Felixstowe shall apply this Policy solely for its charitable purposes and will not need to register with the Information Commission Office.
2. Personal information will be only processed and kept as long as necessary to:
 - a) establish or maintain marketing and support
 - b) provide or administer activities for people who are in association with the organisation or relevant to its purposes
3. Personal data in paper or digital records shall be
 - a) processed lawfully, fairly and in a transparent manner in relation to individuals.
 - b) collected for specified, explicit and legitimate purposes and not further processed that is incompatible with those purposes
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

- d) accurate and kept up to date, with inaccurate and irrelevant data rectified or erased within one month
 - e) kept in a form which permits the identification of the data subjects for no longer than is necessary for the purpose for which the personal data are processed
 - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.
4. The Trustees shall assume the responsibilities of Data Controller and shall ensure that **Annex 1** to this policy will audit and document:
- a) what personal data is held, in what form, where it came from and who it is shared with in Music in Felixstowe
 - b) the date the information is collected and consent given, any amendments and when it is to be updated or deleted
 - c) who receives, shares, transfers, holds and processes the personal data and the purposes to which it is used
5. The Trustees shall ensure that **Annex 2** to this policy shall include:
- a) the notice to be given to individuals on their consent to keep and process their personal data
 - b) the notice to be given to individuals on privacy, including the lawful basis for processing the data
 - c) the rights that individuals have on their personal data
6. The personal data held by Music in Felixstowe may be shared within the organisation for the purpose of carrying out its activities. It will not be shared with any other organisation or individual outside the administration of the organisation without the express consent of the data subject.
7. The Trustees shall appoint one of their number to investigate any personal data breach following a report on this from the relevant Data Processor or an allegation from elsewhere. The Trustee shall inform the other Trustees and any appropriate authority/ies of the outcome.

8. The Trustees shall specify who in Music in Felixstowe shall process personal data and be regarded as a Data Processor, and they will be provided with an up to date copy of this Policy, thereby promoting a positive culture of data protection.
9. A Data Processor for Music in Felixstowe shall be required to:
 - a) be familiar with this Policy and implement its requirements (eg report any problems with the Policy).
 - b) support the Data Protection legislation and promote a positive culture of data protection (eg report any improvements to the Policy).
 - c) implement appropriate technical and organisational measures to show that data protection has been considered and integrated into the data processing activities (eg use of secure facilities and password-protected equipment).
 - d) apply the individual rights of individuals to their data ie their rights to access, accuracy, currency, rectification, portability, erasure and secure disposal of their data, responding within one month of a request, subject to any legal requirements.
 - e) identify and report any personal data breach to the appropriate Trustee.

ANNEX 1 - THE AUDIT OF THE USE OF PERSONAL DATA

The following personal data provided by the individual in whole or in part shall be used by Music in Felixstowe in accordance with the current Policy. This data may be used in the form of lists for recording, contact and mailing purposes, in paper or electronic form that is structured, commonly used and machine readable. The holding or erasure of any personal data in paper or electronic form shall be done securely.

1. For the purposes of establishing and maintaining support for and marketing of the organisation, an individual's -

Name

Address

E-mail address

Telephone number

Requested method of communication with Music in Felixstowe

To which shall be attached in the appropriate format:

- the dates the data was collected, amended and where applicable deleted, and the consent notice/s received.
- Where appropriate, records of any donations and dates.

All such information shall be held for a period of three years or less if requested to be deleted by the individual. After three years and before 4 years the individual shall be asked to further consent for their information to be processed for a further period of 3 years. The individual shall be notified that if there is no response the information shall be deleted from the records and securely disposed of.

Data Processor: the Organiser/Administrator of Music in Felixstowe, shared with the Secretary to the Friends.

2. For the purposes of membership of the Friends of Music in Felixstowe, an individual's -

Name

Address

E-mail address

Telephone number

Requested method of communication with Music in Felixstowe

To which shall be attached in the appropriate format:

- the dates the data was collected, amended and where applicable deleted, and the consent notice/s received.
- records of donations, including amounts and dates
- any indication of anonymity
- any record of a Gift Aid application
- information on renewal and any expiry or cessation of membership

All such information shall be held until the individual requests to no longer be a Friend or after the appropriate reminder does not make a donation for a period of 2 years. The data shall be deleted and securely disposed of, subject to any legal and accounting requirements.

Data Processor: the Secretary to Friends of Music in Felixstowe, and where applicable - for the purpose of Tax Gift Aid shared with the Secretary to the Trustees, - for publicity shared with the programme compiler.

3. To provide or administer activities for people such as performers and facilitators who are in association with Music in Felixstowe or relevant to its purposes, an individual's -

Name

Address

e-mail address

Telephone number

Requested method of communication with Music in Felixstowe

To which shall be attached in the appropriate format:

- the dates the data was collected, amended and where applicable deleted and the consent notice/s received.
- any further relevant information (eg services rendered, performances, availability, payments made).

Data Processor: the Organiser/Administrator of Music in Felixstowe.

Such information shall be held until the individual requests its removal or the information is no longer relevant or necessary for the administration of the activities of Music in Felixstowe. Subject to any legal and accounting requirements to archive the data, the data shall be deleted and securely disposed of.

ANNEX 2 - NOTICE TO AN INDIVIDUAL

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Music in Felixstowe

PERSONAL DATA PRIVACY NOTICE AND YOUR INDIVIDUAL RIGHTS

Under the new General Data Protection Regulations (May 2018) we are required to ask you for your specific written informed consent to hold and process your personal data, including all that we already hold for you. **If we do not receive your consent within one month we must delete your personal data from our records.**

YOUR RIGHTS

In order to pursue its aims as a registered Charity, Music in Felixstowe needs to collect and process personal data and this Notice informs you of what that information is, how it is to be used and your rights concerning your data.

The personal data we hold may consist of any of the following that you give to us: your name, postal address, e-mail address, telephone number, and any other data you give or we attach relating to your association with Music in Felixstowe (eg as a Friend, supplier of services). This includes the method by which you wish to be contacted by us.

The lawful purposes for which Music in Felixstowe shall process your personal data is in furthering its registered charitable purposes and consists of marketing, establishing or maintaining membership or support, providing or administering activities for people who are in association with the organisation or are relevant to its purposes.

The Trustees have approved a Policy on Data Protection which is available for free from the Organiser/Administrator. You have the right to complain to the Information Commissioners Office if you think there is a problem with our handling of your data.

The Policy gives you the following rights regarding the data we hold on you:

to be informed, to have access to it, to rectify it, to have it erased, to restrict its processing, to have your data portable, to report a personal data breach.

your personal data shall be held for a period of 3 years from the date of your consent unless you request it to be deleted earlier; thereafter you will be asked for consent for a further 3 years.

You have the right to find out what information we hold on you without charge by contacting the administrator/organiser and the right to require all or any information held on you to be amended or removed, free of charge, within one month.

June 2018