

SOUTH HAMS COMMUNITY ORCHESTRA

PRIVACY NOTICE

1. Your personal data – what is it?

Providing accessible information to individuals about the use of their “Personal data” is a key element of their legal right to transparency as set out in the UK General Data Protection Regulation (UK GDPR) and other legislation relating to personal data and rights such as the Human Rights Act 1998. Personal data is classed as any information which on its own or in conjunction with other information can identify a data subject.

2. Who are we?

This privacy notice is provided to you by the South Hams Community Orchestra (SHCO), an unincorporated association, which is the data controller for your data.

3. What data do we process?

We will process some or all of the following:

- names and titles;
- contact details such as telephone numbers, addresses, and e-mail addresses;
- photographs and videos;
- Gift aid forms for reclaiming tax on membership fees and any other donations where applicable.

4. How do we process your personal data?

We will comply with our legal obligations to keep personal data up to date; to store and destroy it securely; not to collect or retain excessive amounts of data; to keep personal data secure; to protect personal data from loss, misuse, unauthorised access and disclosure; and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- to enable us to meet all legal and statutory obligations;
- to administer membership records;
- to maintain our website (which may include photographs and videos);
- to raise funds for and to publicise SHCO and to promote its interests;
- to organise concerts (including listing names in programmes);
- to maintain our own accounts and records;
- to process subscriptions and donations that you have made (including Gift Aid information where applicable);
- to seek your views or comments;
- to notify you of details of our rehearsals, concerts and other events and of the identity of committee members and office holders;

- to send you communications which you have requested or which may be of interest to you (these may include information about fundraising activities or about concerts or other activities of SHCO or other music groups);

- to process grant applications.

5. **What is the legal basis for processing your personal data?**

Most of our data is processed because it is necessary for our legitimate interests. Where your information is used for any other purpose, we will first obtain your consent to that use.

6. **Sharing your personal data**

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent.

7. **How long do we keep your personal data?**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

8. **Your rights and your personal data**

You have the following rights with respect to your personal data:

- The right to access information we hold on you - At any point you can contact us to request the information we hold on you, as well as why we have that information, who has access to it and where we obtained it from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

- The right to correct and update the information we hold on you - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

- The right to have your information erased - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

- The right to object to processing of your data - You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

- The right to data portability - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

- The right at any time to withdraw your consent to the processing of data to which consent was sought (see contact details below).
- The right to lodge a complaint with the Information Commissioner's Office.

When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

9. Transfer of data abroad

Any electronic personal data transferred to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

11. Contact Details

Please contact a member of the committee if you have any questions about this privacy notice, or the information we hold about you, or to exercise all relevant rights, or make a complaint.

You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Signed – Chair – Gill Jolly



Date: 25th Sep. 2013

Signed – Committee Member – Robin Bacon



Date: 25 SEP 2013