

# Bromsgrove Concerts

## Data Protection Policy

### Key details

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Approved by committee on: 24<sup>th</sup> May 2022

Next review date: **May 2023**

### Introduction

In order to operate, Bromsgrove Concerts needs to gather, store and use certain forms of information about individuals. These can include members, artists, audiences and potential audiences, business contacts, funders 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 Bromsgrove Concerts' data protection standards and comply with the law.

### Why is this policy important?

This policy ensures that Bromsgrove Concerts:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect the group from the risks of a data breach

### Who and what does this policy apply to?

This applies to all those handling data on behalf of Bromsgrove Concerts, e.g.:

- Committee members, volunteers, and members
- Contractors/3rd-party suppliers

It applies to all data that Bromsgrove Concerts holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Personal or financial information held as part of a record of transactions between an individual and the charity.

### Roles and responsibilities

Everyone who has access to data as part of Bromsgrove Concerts has a responsibility to ensure that they adhere to this policy.

### Data controller

The Data Controller for Bromsgrove Concerts **Janine Parsons**, trustee from June 2022. They, together with the rest of the Committee, are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

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

Bromsgrove Concerts will only collect data where lawful and where it is necessary for the **legitimate purposes for the management of the charity.**

- A member's name and full contact details will be collected by the Data Controller or the box-office provider where used, when they buy a subscription. It is a condition of membership and of eligibility for the member's discount that members agree that these data **are kept by the charity or passed** by the box-office service provider to the charity. They will be used to contact the member regarding **charity membership administration and activities as set down in the constitution and rules and regulations.**
- The name and contact details of volunteers, committee members, 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).
- An individual's name and contact details will be collected by **Bromsgrove Concerts** and/or the specified box-office provider when they make a booking for an event. This data may be needed to be used by the box-office to contact them about their booking and to allow them entry to the event. Postal details will be supplied to the charity for management of its marketing efforts and any other legitimate purposes that do not require explicit active consent.
- An individual's name, contact details and other details may be collected at any time (at an event), with their active consent, in order for Bromsgrove Concerts to communicate with them about group activities, and for Direct Marketing.

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

When collecting data, Bromsgrove Concerts will always explain to the subject why the data is required and what it will be used for. 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.

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

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

## **We ensure data is accurate and up-to-date**

Bromsgrove Concerts will ask members and volunteers to check and update their data regularly. Any individual will be able to update their data at any point by contacting the Data Controller.

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

Bromsgrove Concerts 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. The contact details of an individual who ceases to be a member will be held in the 'post only' list and subject to confirmation

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

The following requests can be made in writing to the Data Controller:

- Members, volunteers and supporters can request to see any data stored on 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 request will be actioned within 14 days of the request being made.
- Members and supporters can object to any storage or use of their data that might cause them substantial distress or damage or any automated decisions made based on their data. Any such objection will be considered by the committee, and a decision communicated within 30 days of the request being made

## **We keep personal data secure**

Bromsgrove Concerts will ensure that data held by us is kept secure.

- Electronically-held data will be held password-protected.
- Physically-held data (email sign-up sheets) will be stored by the data controller membership and concert booking forms will be stored by the treasurer.
- Access to data will only be given to relevant committee members/contractors where it is clearly necessary for the running of the group. The Data Controller will decide in what situations this is applicable.

## **We do not share members' data with other members.**

### **Direct marketing**

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

Any time data is collected for this purpose, we will provide:

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

A cookie is a small text file that is downloaded onto 'terminal equipment' 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. Bromsgrove Concerts does not use cookies on its website in order to monitor and record their activity.

*Last Reviewed by Trustees May 24<sup>th</sup> 2022 jc*