



Data Protection policy

1. Overview

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Introduction

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

These can include members, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the DSO 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 DSO's data protection standards and comply with the General Data Protection Regulations (GDPR).

Why is this policy important?

This policy ensures that DSO

- 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

2. Roles and responsibilities

Who and what does this policy apply to?

This applies to *all* those handling personal data on behalf of DSO e.g.:

- Committee members
- Members
- Contractors

- Third-party suppliers

It applies to all personal data that DSO holds relating to individuals, including:

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

Roles and responsibilities

DSO is the Data Controller and will determine what data is collected and how it is used. The DSO trustees are responsible for the secure, fair and transparent collection and use of data by DSO. Any questions relating to the collection or use of data should be directed to DSO's appointed Data Protection Lead at privacy@dulwichsymphony.org.uk

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

DSO uses third party Data Processors (including Mailchimp, Eventbrite, Survey Monkey, Doodle, Catalyst2 (our ISP) and Google) to process data on its behalf. DSO will ensure that it uses third party suppliers which are compliant with GDPR.

3. Data protection principles

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

DSO will only collect data where lawful and where it is necessary for the legitimate purposes and interests of the DSO.

- A member's name and contact details will be collected when they first join DSO, and will be used to contact the member about group membership administration and activities. Other personal data may also subsequently be collected in relation to their membership, including their payment history for subscriptions.
 - Lawful basis for processing this personal data: Contract (the collection and use of data is fair and reasonable in relation to DSO completing tasks expected as part of the individual's membership).
- The name and contact details of volunteers and contractors will be collected when they take up a position, and will be used to contact them about DSO 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 DSO 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 DSO 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, so that DSO can communicate with them about group activities. See 'How we get consent' below.
 - Lawful basis for processing this data: Consent (see 'How we get consent')

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

When collecting data, DSO 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

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

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

DSO will ask members, contractors and volunteers to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the data protection lead on the DSO committee.

e) We ensure data is not kept longer than necessary

DSO 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 DSO's data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

f) We keep personal data secure

DSO will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data will be stored securely, preferably in a locked drawer or cabinet.

- Access to data will only be given to relevant committee members and contractors where it is necessary for the running of the group. The data protection lead 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

DSO will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

4. Individual rights

When DSO collects, holds and uses an individual's personal data that individual has the following the rights over that data. DSO 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. These rights are:

- *Right to be informed:* whenever DSO 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 DSO holds on them and confirmation of how it is being used. Requests should be made in writing to the data protection lead 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. DSO 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. DSO 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. DSO 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, DSO will restrict the data while it is verified).

Though unlikely to apply to the data processed by DSO we will also ensure that rights related to portability and automated decision making (including profiling) are

complied with where appropriate.

5. Member-to-member contact

DSO will only share a member's data with other members with the subject's prior consent.

6. How we obtain consent

DSO 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 group activities.

Any time 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
- Data collected will only ever be used in the way described and 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.

7. Cookies on the DSO website

DSO will not use cookies on its web site.

8. Data retention policy

Introduction

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

It forms part of DSO Data Protection Policy.

Roles and responsibilities

DSO is the Data Controller and will determine what data is collected, retained and how it is used. A member of DSO will be nominated as data protection lead. The DSO trustees are responsible for the secure and fair retention and use of data by DSO. Any questions relating to data retention or use of data should be directed to the data protection lead.

9. Regular data review

A regular review of all data will take place to establish if DSO 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 took place on 3 May 2018.

Data to be reviewed

- Data in digital form accessible by committee members
- Data stored on third party online services
- 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 lead supported by committee members to be decided on at the time of the review.

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.
 - If deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails), the data may be retained safely and securely, but not used.

Statutory Requirements

Personal data stored by DSO may be retained based on statutory legal obligations for storing data other than data protection regulations. This might include but is not limited to:

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

Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

	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 get 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	Get consent
Can the data be anonymised	Anonymise data	Continue to use

Other data retention procedures

Member data

- When a member leaves DSO and all administrative tasks relating to their membership have been completed any potentially sensitive personal data held on them will be deleted, unless DSO is required to retain this personal data to meet its legal obligations

- Unless consent has been given, personal data will be removed from all 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 personal data will be removed as soon as is practically possible.
- All other personal data will be stored safely and securely and reviewed as part of the next two-year review

Volunteer and contractor data

- When a volunteer or contractor stops working with DSO and all administrative tasks relating to their work have been completed, any potentially sensitive personal data held on them will be deleted, unless DSO is required to retain this personal data to meet its legal obligations. 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.