



TROWBRIDGE SYMPHONY ORCHESTRA

Registered Charity 1049949

TSO DATA PROTECTION POLICY

Overview

Key details

- Policy prepared by: Peter Wratten
- Approved by TSO Committee on: 26 February 2019
- Next review date: February 2022

Introduction

In order to operate, the Trowbridge Symphony Orchestra needs to gather, store and use certain information about individuals.

These can include members, volunteers, employees, contractors, suppliers, audiences and potential audiences, business contacts and other people the orchestra 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 the Trowbridge Symphony Orchestra's data protection standards and to comply with the law.

Why is this policy important?

This policy ensures that the Trowbridge Symphony Orchestra:

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

Roles and responsibilities

Who and what does this policy apply to?

This policy applies to all those handling data for the Trowbridge Symphony Orchestra, e.g.

- Committee members
- Members
- Employees and volunteers
- Contractors/3rd-party suppliers

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TSO Data Protection Policy

It applies to all data that the Trowbridge Symphony Orchestra holds relating to individuals, including:

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

Roles and responsibilities

Everyone who has access to data held by the Trowbridge Symphony Orchestra has a responsibility to ensure that they adhere to this policy.

The TSO Secretary has primary responsibility for controlling data and for preparations to meet the General Data Protection Regulation (GDPR), in force from May 2018. The TSO Secretary together with the TSO 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 Secretary.

Data protection principles

1. We fairly and lawfully process personal data

The Trowbridge Symphony Orchestra will only collect data where lawful and where it is necessary for the legitimate purposes of the orchestra.

- A member's name and contact details will be collected when they first join the orchestra, and will be used to contact the member about orchestra membership, activities, and administration. Other data may also be collected subsequently in relation to their membership, including their history of subscription payments.
- The name and contact details of committee members, volunteers, employees and contractors will be collected when they take up a position, and will be used to contact them regarding the administration of the orchestra as related to their role.
- Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary, for example in order to process payments to the person.
- An individual's name and contact details will be collected when they book tickets for a concert. This will be used to contact them about their booking and to allow them entry to the concert.
- An individual's name, contact details and other details may be collected with their consent at any time (including when booking tickets or at an event), so that the Trowbridge Symphony Orchestra can communicate with them about the orchestra's activities, and/or for Direct Marketing. See 'Direct Marketing' below.

TSO Data Protection Policy

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

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

e.g. *“Please enter your email address in the form below. We need this so we can send you email updates about the orchestra, including rehearsal and concert schedules, payment of subscriptions and other business.”*

We will never use data for any purpose other than that stated, or that can reasonably be considered related to it. For example, we will never pass on personal data to 3rd parties without the explicit consent of the subject.

3. We ensure any data collected is relevant and not excessive

The Trowbridge Symphony Orchestra will not collect or store more data than the minimum information required for its intended purpose.

4. We ensure data is accurate and up-to-date

The Trowbridge Symphony Orchestra will ask members, volunteers and staff to check and update their data at least every five years.

Any individual will be able to update their data at any time by contacting the Secretary.

5. We ensure data is not kept longer than necessary

The Trowbridge Symphony Orchestra will keep data on individuals for no longer than is necessary after our involvement with the individual has stopped, complying with any legal requirement to keep records for a specific period. We will retain the contact details of occasional augment players who may play with TSO in the future.

6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Secretary:

- Members, volunteers and supporters can request to see any data stored about them. Any such request will be actioned within 30 days of the request being made.
- Members and supporters can request that any inaccurate data held about them is updated. Any such request will be actioned within 30 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 30 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 TSO Committee, and a decision communicated within 30 days of the request being made.

TSO Data Protection Policy

We keep personal data secure

The Trowbridge Symphony Orchestra 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 (e.g. membership forms or email sign-up sheets) will be stored securely.
- Access to data will only be given to relevant committee members or nominated members where it is clearly necessary for the running of the orchestra. The Secretary will decide in what situations this is applicable.

- **Transfer to countries outside the EEA**

The Trowbridge Symphony Orchestra will not transfer data from the United Kingdom to countries outside the European Economic Area (EEA), unless that country has adequate protection for the individual (e.g. USA).

Member-to-member contact

We only share members' data with other members with the subject's prior consent. As a membership organisation the Trowbridge Symphony Orchestra encourages communication between members.

To facilitate this:

- Members can request the personal contact data of other members from the Secretary. These details will be given, provided they are for the purposes of contacting the subject (e.g. an email address, but not financial or health data) and the subject consents to their data being shared with other members in this way.

TSO Data Protection Policy

Direct Marketing

The Trowbridge Symphony Orchestra will regularly collect data from consenting Friends and supporters for marketing purposes. This includes contacting them to promote concerts, updating them with news about the Orchestra, fundraising and other group activities.

When 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 the Trowbridge Symphony Orchestra 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. a 'tick box').

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data to market 3rd-party products unless this has been explicitly consented). Marketing communications will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Requests to unsubscribe will be processed within 30 days.

January 2019