



Introduction

In order to operate, London Pro Arte Choir (LPAC) needs to gather, store and use certain forms of information about individuals.

These can include members, musicians, suppliers, volunteers, audiences and potential audiences, business contacts and other people the choir 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 LPAC data protection standards and comply with the General Data Protection Regulation (GDPR).

Why is this policy important?

This policy ensures that LPAC:

- Protects the rights of our members, contract musicians and supporters.
- Complies with data protection law and follows good practice.
- Protects the choir 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 LPAC e.g.:

- Officers (committee members and those appointed to fulfil a specific role)
- Members
- Contract musicians
- Other suppliers

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

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

Roles and responsibilities

LPAC is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for LPAC is Kate Bodsworth. They, together with the committee, are responsible for the secure, fair and transparent collection and use of data by LPAC. Any questions relating to the collection or use of data should be directed to the Data Protection Officer at data@lpac.org.uk.

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

Data protection principles

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

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

- A member's name and contact details will be collected when they first join the choir, and will be used to contact the member regarding choir activities. Other data may also be collected in relation to their membership, including their payment history and bank details if they are receiving a payment from the choir. **Lawful basis for processing this data: Legitimate interests** (the collection and use of data is fair and reasonable in relation to LPAC completing tasks expected as part of the individual's membership).
- The name, contact details, biographies and pictures of contract musicians will be collected when they take up a position, and will be used to contact them regarding choir administration related to their role. Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary in order to process payment to the person. **Lawful basis for processing this data: Contract** (the collection and use of data is fair and reasonable in relation to LPAC 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 LPAC 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, in order for LPAC to communicate with them about and promote choir activities. **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, LPAC 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

LPAC will not collect or store more data than the minimum information required for its intended purpose. For example we need to collect telephone numbers from members in order to be able to contact them about choir administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of choir administration.

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

LPAC will ask members and regular contract musicians 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 Officer.

e) We ensure data is not kept longer than necessary

LPAC 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 LPAC's data retention policy. When the intended use is no longer applicable, the data will be deleted within a reasonable period. Members who leave the choir will be invited to join our mailing list.

f) We keep personal data secure

LPAC will ensure that data held by us is kept as secure as reasonably possible.

- Personal data will normally only be kept in the musical director's or members' home subject to normal security.
- Access to personal data will only be given to the musical director, committee members and other officers on a need to know basis, except where the data subject has given consent.
- All those possessing personal data will be advised on appropriate security precautions.

g) Transfer to countries outside the EEA

LPAC 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.

Individual Rights

When LPAC collects, holds and uses an individual's personal data that individual has the following the rights over that data. LPAC 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.

- *Right to be informed:* whenever LPAC 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 LPAC holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month.
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. LPAC 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. LPAC 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. LPAC data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose for which 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, LPAC will restrict the data while it is verified).

Member-to-member contact

LPAC only shares members' data with other members with the subject's prior consent. As a membership organisation, LPAC encourages communication between members. We will encourage members to consent to share their contact details and photographs on lists which will only be available to other members for use on choir business. Members can opt out of this at any time.

How we get consent

LPAC will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about choir news, fundraising and other choir 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.
- 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 and will not be shared with third parties, except where required by law.

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.

Other relevant documents

This policy should be read in conjunction with the Data Protection Procedures, Data Retention Policy, and relevant Privacy notices.

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