

Privacy Notice

April 2019

1. INTRODUCTION

Crowthorne Orchestra (hereafter referred to as *The Orchestra*) is committed to protecting your privacy and security. This Notice explains how and why we use your personal data, and to ensure you remain informed and in control of your data.

2. DEFINITIONS

“We” and “Us” refer to The Orchestra, represented by its committee

“The Orchestra” also refers to Crowthorne Orchestra’s subsidiary CSO Productions Ltd, represented by its directors

“Personal data” - any data which identifies you, or which can be identified as relating to you personally.

For the purposes of data protection law, The Orchestra will be the *data controller* and *data processor*.

“Members” – regular attendees of Orchestra rehearsals and concerts and who pay a subscription

“Guest Players” – non-Member players who are engaged on a per-concert basis

3. WHAT INFORMATION WE COLLECT

3.1. Personal data you provide

We collect personally identifiable data you provide to us. This includes information you give when:

- communicating with The Orchestra
- payment is taken by The Orchestra for subscriptions and concert tickets, or for other services, for example, the hire of equipment
- making a donation to or sponsoring The Orchestra, or by making a GiftAid declaration
- The Orchestra places an order with you for goods or services, including the hire of concert and rehearsal venues and the engagement of Guest Players
- you require reimbursement for expenditure made on behalf of The Orchestra.

The data can include:

- Personal details, including your name, email and (where required) postal addresses, and telephone numbers
- Financial information when The Orchestra itself needs to make payments to other organisations for goods and services, or to reimburse volunteer expenditure. (In these cases, bank account information will be stored by our banking providers, currently CAF Bank and HSBC).

Note: Although financial details are collected temporarily for the purposes of receiving subscriptions and other payments, these are **not retained** by The Orchestra. Also, The Orchestra does **not** collect financial details supplied when tickets are bought online.

3.2. Personal data that we create

We will produce photographic images of The Orchestra from time to time, for use in concert programmes, on the website, in social media and for the purposes of promoting the Orchestra.

4. HOW WE USE INFORMATION AND CONSENT

We only ever use your personal data where it is necessary to enter into, or perform, a contract with you, or for our own lawful, legitimate interests, provided your rights don’t override these. In any event, we’ll use your information only for the purpose or purposes it was collected (or else for closely related purposes):

4.1. Administration of Membership

We use Members’ personal data for administrative purposes ie. in order to organise, run and administer The Orchestra (which would not be possible if we could not hold and process this data). This includes, **and will be confined to:**

- maintaining a database of Orchestra Members from year to year
- maintaining a database of Members’ names taking part in concerts, which are published in The Orchestra concert programmes
- maintaining an archive of photographic images of The Orchestra for use in concert programmes and the website (Individuals can elect not to appear in photos)
- informing players of rehearsal and concert arrangements
- sending out information promoting The Orchestra, its activities and achievements

- receiving payments for subscription, donations, sponsorship and for fulfilling other services
- receiving standing order and GiftAid instructions.

Note: We do not propose to obtain consent to use Members' personal data for other purposes than set out above.

4.2. Guest Players

We will also maintain a database of Guest Players' details, however we will request their consent to retain their details every year. Guest Players electing to remain on The Orchestra's distribution list will be treated as if they are Members for the purposes of administering The Orchestra (see 4.1).

4.3. Promoting The Orchestra

We will make extensive use of social media to promote The Orchestra, including photographs that we have obtained. Those wishing to receive these promotional updates will need to "follow" The Orchestra social media channels, and to "unfollow" if you wish to opt out of this. An online newsletter is distributed occasionally to those who have signed up for it. Those no longer wishing to receive this can unsubscribe.

5. DISCLOSING AND SHARING DATA

We will never sell your personal data, nor share it with another company or charity for marketing purposes.

Your personal data will be shared amongst the committee members of The Orchestra and designated volunteers who undertake specific tasks on the committee's behalf, in order that we can fulfil our legitimate interests, including meeting our obligations to the Members of The Orchestra.

We share personal data with the following service providers, each of which has their own privacy policy:

- The third-party *DotEasy* hosts our web site
- The third-party *Campaign Monitor* is used for the distribution of Orchestra online newsletters. Those wishing to receive these newsletters subscribe to this service
- The third-party *WeGotTickets* is used to provide an online ticketing service
- Secured Google Drive and Dropbox are used for backing up and storage of some data shared amongst committee members and designated volunteers.

6. HOW WE PROTECT DATA

To protect your personal information, we will take whatever precautions we can and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. Personal data collected and used by The Orchestra will be stored on, or accessed via passworded computers always kept in the homes/offices of committee members or designated volunteers, and these may be backed up securely to a local device or to the cloud. Any memory sticks or paper-based records containing personal data will be kept in locked drawers.

7. STORAGE

7.1. Where we store information

The Orchestra's operations are based in the UK and generally we store our data within the UK. However, the following organisations which provide services to us operate outside the EEA: DotEasy and the Cloud providers (US), and Campaign Monitor (Australia).

7.2 How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. In general terms, we will retain Members' personal data for up to **3 years** following its last use, after which it will be deleted – an example of this is the personal data associated with Members who have not been participating in rehearsals and concerts during that period. Consent to hold Guest Player personal details will be obtained **every year**. (Note: GiftAid information will be held for at least 6 years). However, if you request that we erase all your personal data, then that will be actioned as soon as possible. Each year within a month of the reconvening of The Orchestra in the Autumn term, we will review what information we hold and delete what is no longer required.

8 CONTROL OF YOUR PERSONAL DATA

8.1 Your rights

You may exercise the following legal rights regarding your personal data which The Orchestra collects and uses:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold about you
- the right to have your data erased
- the right to have inaccurate data corrected
- the right to object to your data being used for any purpose.

For further information on your rights or if wish to exercise them, please make contact using the details below.

8.2 Complaints

Complaints to The Orchestra should be directed via email to the contact address below. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk.

8 LINKS TO OTHER WEB SITES

Our web site contains hyperlinks to other web sites. We are not responsible for the content or functionality of any of those external web sites. If an external web site requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by this Policy. We suggest you read the privacy policy of any web site before providing any personal information.

9 CHANGES TO THIS POLICY

We'll amend this Policy from time to time to ensure it accurately reflects how and why we use your personal data. The latest version of our Privacy Policy will always be posted on our website.

10 QUESTIONS AND CONTACT INFORMATION

If you would like further information on your rights regarding your personal data or wish to exercise them, or to raise a complaint, please contact us by email at dataprotection@CrowthorneOrchestra.com, or by phone: 01276-452754.