

# **Abertillery Orpheus Male Choir - Privacy Policy and General Data Protection Regulations (GDPR)**

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## 1. Introduction

On 25 May 2018 new General Data Protection Regulations were brought into force. This is a new EU law governing Data Protection, and supersedes the Data Protection Act 1998. It was brought into law in 2016 but is only now coming into force after a two-year period of preparation. There are no exemptions from the new Regulations, which apply to all holders of data referring to living persons. This does apply, therefore, to all member of this Choir, whether its is a registered charities or not. The principles of data-holding: Lawfulness, Fairness, Transparency.

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe. The Definition of Personal Data under the General Data Protection Regulations (GDPR) Act is data that can identify a specific individual. So a person's name on its own does not constitute Personal Data. However, a person's name combined with an postal address or email address would constitute Personal Data under the Act.

2. Abertillery Orpheus Male Choir (Cor Meibion Abertyleri) is a non-political, non-sectarian Male Voice Choir. The Objectives of the Choir is;

- The study and practice of male choral music in order to foster public knowledge and appreciation of such music by means of public performance.
- To assist and support such charitable institution or purposes as the Management Committee shall from time to time determine.
- To undertake such other activities as may from time to time be determined, which are not inconsistent with the above.

3. Explaining the legal bases we rely on The law on data protection, based on the General Data Protection Regulation and formerly the Data Protection Act, sets out a number of different reasons for which a choir may collect and process your personal data, including:

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you. You are free to opt out of receiving these requests from us at any time by contacting us.
- To confirm that we have carried out your instruction such as posting a job vacancy, concert promotion, choir rules and constitution, etc.
- For promotion of our services and choral related products and services your choir may have an interest in, including the choir Newsletter and selected third party mailings. You are free to opt out of receiving these requests from us at any time by contacting us at [abertilleryorpheus@colcanto.co.uk](mailto:abertilleryorpheus@colcanto.co.uk).

Abertillery Orpheus Male Choir (Cor Meibion Abertyleri) uses 'soft opt-in' methods to collect and store email contact information. This means;

We only collect email addresses from choir members, sponsors, vice presidents, patron and friends of the choir that are already listed on our site or have requested to be listed on the site or to do business via our website or concert advertisers.

Any marketing mailshots that are related to Abertillery Orpheus Male Choir (Cor Meibion Abertyleri) about forthcoming choir related events or marketing opportunities.

We provide an opt-out or unsubscribe mechanism for those who do not wish to receive marketing opportunity mailings.

We do not buy-in or sell mailing lists or contact information on third parties.

We will only hold email contacts details while they remain relevant and will delete or amend them upon request. We are reliant on choir members, sponsors, vice presidents, patron and friends of the choir to keep us up to date on any changes to email contacts or website address changes.

We may hold Next of Kin contact details for Choir members where we are on tour and may need to contact the family in the event of illness or other emergencies

You can unsubscribe from the mailing list at any time by sending me an email with the words 'unsubscribe Abertillery Orpheus' plus your email address.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations. If you have asked us to place an advert in our concert programme on behalf of your organisation or business then we will require your data to pursue our legitimate interests in a way which might reasonably be expected as part of advertising your business, and which does not materially impact your rights, freedom or interests

### **4. When do we collect personal data**

We collect personal data when you join the choir, become a Patron, President, Vice President or a Friend of the Choir.

We also collect personal data when you request a business advert be included in a concert programme

When you engage with us on social media.

When you contact us by any means to make enquiries

We collect personal data when you pay your choir subs or choir lotto payments in person or via bank payment.

## **5. What sort of personal data do we collect?**

For Choir members we request the name and address. We also request your email address /telephone number if you have one so that we can contact you and we may also ask for your NOK details. If you wish to pay your Choir Subs or Choir Lotto by bank transfer/standing order we may request your Bank details..

For Patrons, Presidents, friends of the Choir and Ex Officio members of the Management Committee we request the name and address. We also request your email address / contact telephone number if you have one so that we can contact you. If you come on Choir tours with the Choir we may also ask for your NOK details.

For concert advertising we may publish online personal details where it is necessary to enable people to purchase tickets or seek further information about a concert. We also publish online personal detail to enable potential recruits and bookers to the choir to contact us.

For advertisers we collect all the necessary personal information to enable us to advertise the subscriber's business and to enable us to invoice the company. This data may include names, addresses, telephone.

Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

Copies of documents you provide us or signed contracts.

## **6. Here's how we'll use your personal data and why:**

To perform any contract we've agreed with you. If we don't collect your personal data during this process, we won't be able to provide the required services and comply with our legal obligations.

To respond to your queries or complaints. Handling the information, you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

To protect our business from fraud and other illegal activities. We'll do all of this as part of our legitimate interest.

With your consent, we will use your personal data, as part of our mailing list, to keep you informed by email/facebook about relevant rehearsals, cancellations, concerts, events and so on.

To send you relevant, personalised communications by email in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest.

You can unsubscribe from the mailing list at any time by sending me an email with the words 'unsubscribe Abertillery Orpheus' plus your email address.

To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do

not use your personal data for these purposes, we would be unable to comply with our legal obligations.

To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.

To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you. You are free to opt out of receiving these requests from us at any time by contacting us.

## **7. How we protect your personal data**

We know how much data security matters to all our clients. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. Our computers and mobile devices are all password protected. We regularly monitor our systems for possible vulnerabilities and constantly review our security.

## **8. How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. If you request to unsubscribe to future mailings your data will be deleted completely and a record of your unsubscription retained. Equally if the data changes, for instance the name of the choir contact changes, we will amend the email details accordingly. Her Majesty's Revenue and Customs (HMRC) requires us to keep records of contracts, payments and invoices for 7 years. We will therefore normally hold information of any contracts for this long.

## **9. Who do we share your personal data with?**

We do not share your personal data with other choir, advertisers or other third parties, except as covered in Section 5.

The mailing lists is not available for sale and we do not purchase mailing lists.

On Facebook there are a limited number of administrators who look after the Abertillery Orpheus Male Choir facebook page.

We may, in exceptional circumstances, share personal data with legal or law enforcement authorities - for instance in fraud or money laundering enquiries.

## **10. Where is personal data stored**

Personal data is stored on a local computer at the home of the owner/administrator of the Choir and is backed up regularly and virus protected.

## **11. What are your rights over personal data. An overview of your rights**

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases.

The correction of your personal data when incorrect, out of date or incomplete.

The right to deletion, for example when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as a change of choir contact information or the closure of a choir).

That we stop using your personal data for direct marketing via email.

You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact us at [abertilleryorpheus@colcanto.co.uk](mailto:abertilleryorpheus@colcanto.co.uk). If we decide not to action your request we will explain to you the reasons for our refusal.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent. You can unsubscribe from the mailing list at any time by sending me an email with the words 'unsubscribe 'choir name' plus your email address.

Where we rely on our legitimate interest In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing - You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

## **12. How can you stop the use of your data for direct marketing**

You can stop direct marketing communications from us by sending me an email with the words 'unsubscribe Abertillery Orpheus' plus your email address. On Facebook you can remove yourself as a member of the Abertillery Orpheus Male Choir Group.

## **13. Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

#### **14. If you live outside the UK**

Abertillery Orpheus Male Choir regularly tours outside the UK and also hosts Choirs from outside the UK. To enable the Management Committee to function and administer these tours and visits, it is necessary for us to hold personal data from those Choir contacts and their management.

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes. Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK. By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes. This may occur because our information technology storage facilities and servers are located outside your country of residence and could include storage of your personal data on servers in the UK. We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

#### **15. Any Questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, or if you wish to unsubscribe please contact us at [abertilleryorpheus@colcanto.co.uk](mailto:abertilleryorpheus@colcanto.co.uk)

*Please note that this is a small choir with no specific Data Protection Officers so requests for information may take a little longer than larger businesses with dedicated Data Protection officers*