

# Witney Music Society Privacy Policy

## 1. Summary

Witney Music Society is a registered charity whose primary aim is organising and running classical music concerts in Witney. The Society collects, stores and uses contact and other information as an essential part of its operations. In accordance with the new General Data Protection Regulation (GDPR), the Society has reviewed the purpose of its data processing activities and determined the lawful basis for each activity.

We believe that the Society complies with all legislation; the Society is run by unpaid volunteers and where there are judgements to be made, we have applied the principle of proportionality.

We aim to treat all our contacts in an open, respectful and courteous way. We will amend or delete personal information at the request of the data subject.

## 2. Objectives

We use personal data only in legal ways in accordance with the objectives as stated in our constitution as follows: 'to promote, improve, develop and maintain public education in, and appreciation of, the art and science of music in all its aspects'.

## 3. Lawful basis for data processing

### 3.1 Legitimate interest assessment

We believe that our collection and use of contact information (primarily email and postal addresses) conforms to the guidance from the Information Commissioner's Office (ICO) "Legitimate interest is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing".

We have applied the ICO tests as follows:

#### 3.1.1 identify a legitimate interest

Our legitimate interest is the advancement of musical education and appreciation of music through the promotion of an annual concert season and distribution of information relating to other musical activities in the area.

#### 3.1.2 demonstrate that the processing is necessary to achieve it

The processing is primarily the collection, storage and responsible use of email and/or postal addresses in order to inform people about concerts; we collect this information only where we have good reason to believe that the subject is interested in music and concerts.

#### 3.1.3 balance it against the individual's interests, rights and freedoms

Since we do not hold passwords, or especially sensitive information relating to our contacts, we consider our use of personal data to be low risk.

We consider that sending information by email is not intrusive as emails can easily be deleted and we provide means to unsubscribe. We consider that recipients benefit from the Society's processing of data in order to send email information about forthcoming concerts and other related activities.

Overall we consider our practices to be proportionate given the objectives of the GDPR and that we have obtained a good balance in our use of personal information.

### **3.2 Consent**

Witney Music Society has updated its application forms to ensure that individuals are fully informed about the use of data supplied when applying for membership or for other activities relating to the Society. The Society will retain detailed records of this consent.

## **4. Data handling**

### **4.1 Data Controller**

Dr Tom Jones: 10, Woodlands Road, Witney OX28 2DN; witneymusicsociety@gmail.com

### **4.2 Data Processors**

Details of current data processors may be obtained from the data controller.

## **5. Collection of information**

Witney Music Society collects information on people interested in the activities of the society in the following ways:

- manually from people attending our concerts who complete a membership application form;
- manually from people who complete the membership subscription form on our website or in the printed brochure;
- manually from people attending our concerts who ask to be added to our mailing list by completing, or adding their details to, an appropriate form;
- electronically from people who contact us by email asking to receive a copy of the annual brochure by being added to our postal mailing list, or to be added to our electronic mailing list, or to both;
- occasionally from people telephoning or meeting a member of the Society and asking to be added to our mailing list (a record of such requests is kept);
- we have previously added to our contacts list, from time to time, details of people whom we have reason to believe will be interested in receiving information on concerts. We have retained this information under the provisions of Article 6.1(f) of GDPR in pursuit of our "legitimate interests" in promoting music in accordance with our objectives.

## **6. Information handling**

### **6.1 Access to information**

We will be happy to provide anyone with copies of the information that we hold about them. Requests should be sent to the Data Controller, Dr Tom Jones.

### **6.2 Disclosure and erasure**

Witney Music Society does not disclose personal information to other persons or organisations. If a request is received for contact information for a specific individual, the Society will contact the individual in person to determine whether that information may be provided.

If a currently subscribing member wishes to resign and asks explicitly to have their personal information deleted we will delete this information from our Membership list but their name and related details will remain in our accounting system and bank records as required by other regulations.

We will keep a record of all explicit requests for the deletion of personal information.

### **6.3 Correction and updating**

Witney Music Society will correct and update any information as soon as reasonably possible after being informed of the need to do so.

## **7. Personal data audit**

### **7.1 Data stored**

Witney Music Society holds the following personal data:

- membership records (currently in paper and digital form) comprising some or all of: name, address, email address, telephone number, membership history
- a mailing list of names and postal addresses for sending the annual brochure to members and others who have expressed an interest
- a list of names and email addresses for distributing information about forthcoming concerts
- trustees' data (name, address, date of birth) for the Charity Commission
- information supplied by artists (some or all of: name, address, email address, telephone number, bank account information)

Except as indicated above, Witney Music Society does not store dates of birth, health or other sensitive personal information. Artists' bank account information is only stored as long as is necessary in relation to their concert contract with us. We do not issue or store passwords relating to our data subjects.

### **7.2 Means of storage**

Personal data is stored on the hard drives of the data controller and data processors, accessible only under password.

### **7.3 Period of storage**

Contact information stored for the purpose of sending out information about Witney Music Society's activities will be stored for as long as it appears to be useful, or until the data subject requests its erasure, whichever is the shorter.

### **7.4 Backups and deletions**

In order to protect the integrity of our stored data, we make periodic back-ups and we retain sets of backed-up data in case the data is corrupted by a virus that lies dormant for months or years before spreading. Such a virus would cause us to go back over many back-ups to find uncorrupted data. In practice back-ups are hardly ever used but are a wise precaution.

When we receive a request for erasure, it will not be practicable for us to go through all the back-ups erasing data but we will erase the data from the current record and record the erasure so that if we

need to use backed-up data we can erase the relevant items from the backed-up data when we start to use it.

## **8. Complaints**

If you have any concerns about the way in which we process personal information, please address your concerns to our data controller Dr Tom Jones.

You are also entitled to make a complaint to the Office of the Information Commissioner, see <https://ico.org.uk/concerns/>

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Witney Music Society  
Registered charity 1041940