

PRIVACY NOTICE

WHO WE ARE

The Aldeburgh Music Club (“AMC” or “the Group”) is aware of its obligations under the General Data Protection Regulation (GDPR), effective 25th May 2018, and is committed to processing the data of its members, patrons, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts, and other people the group has a relationship with and needs regularly to contact, securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you, in any one or more of those categories. It also sets out how we use that information, how long we keep it, and other relevant information about your personal data.

This notice applies to individuals, within the categories listed above, whose data we currently hold, or will hold in the future, and have an operational need to process.

The AMC’s objects are:

- a) To promote, improve, develop and maintain public education in, and the appreciation of the art and science of music in all its aspects, by the presentation of public concerts, and by such other ways as the AMC through its Committee shall determine from time to time.
- b) To further such charitable purposes as the AMC shall decide from time to time, including cooperation with neighbouring choirs and providing opportunities for pupils from schools to participate in its concerts.

The Group recruits members who pay an annual subscription to, inter alia, meet the cost of concert rehearsals. The Group makes significant financial commitments to arrange a three-year rolling programme of concerts, for which it books venues, soloists and orchestras, and provides rehearsal venues and facilities. Members are expected to commit to rehearse for concerts in which they expect to perform, and to attend, and prepare themselves, for those rehearsals.

Supporters of the Group are invited to become a Patron in return for the payment of a donation.

Contractors of the Group include (amongst others) its Musical Director, the Orchestral Manager and members of an orchestra and other musicians and soloists performing with the Group in a concert.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how AMC will use (or ‘process’) personal data about members, patrons, employees, contractors, volunteers and supporters.

This information is provided because GDPR, and associated UK law, gives individuals rights to understand how their data is used. If you are in one of the above categories, you are encouraged to read this Privacy Notice and understand AMC’s obligations to its entire community.

This Privacy Notice applies alongside any other information AMC may provide about a particular use of personal data, for example when collecting data via an online or paper form.

RESPONSIBILITY FOR DATA PROTECTION

The Group is a **Data Controller**, meaning that it determines the processes we employ when using your personal data. Our contact details are as follows:

Email: aldeburghmusicclub@gmail.com

The Group's **Compliance Officer** is its Chairman, who will endeavour to ensure that all personal data is processed in compliance with this policy, the GDPR and Data Protection Law, and to oversee requests and enquiries concerning the Group's uses of personal data.

DATA PROTECTION PRINCIPLES

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the fulfilment of the Group's objects
- only use it in the way that we have told you about
- seek to ensure it is correct and up to date
- process it in a way that ensures it will not: be used for anything that you are not aware of or have consented to (as appropriate); be lost or destroyed

WHY THE GROUP NEEDS TO PROCESS PERSONAL DATA

The fulfilment of AMC's objects is supported by a range of activities. These include:

- Communication, by electronic and print media, with an entire mailing-list or selected interest-groups, of rehearsal and performance schedules, rehearsal feedback and directions, news, reports, and forthcoming events.
- Communication and support for the organisation and management of social and fundraising events
- Communication relating to the promotion of concerts and booking arrangements

We'll only use your information where we have your consent, or we have another lawful reason for using it. These reasons include where we need to pursue our legitimate interests to fulfil the objectives of the Group, or we need to process your information to carry out an agreement we have with you, or we have a legal or financial obligation to do so.

TYPES OF PERSONAL DATA PROCESSED BY THE GROUP

This may typically include, by way of example:

- All data subjects: Name, address, email, phone numbers, emergency contact
- In relation to members: Subscription payments, bank details, Gift Aid Declarations, photographs
- In relation to Patrons: Donations, Standing order or other banking arrangements, Gift Aid Declarations
- In relation to Contractors: Bank details

HOW THE GROUP COLLECTS DATA

A member's name and contact details will be collected when they first join the group, and will be used to contact the member regarding group membership administration and choir activities. New members, on or after 25th May 2018 will be subject to provision of consent to the holding and processing of their personal data under this Notice.

The name and contact details of Patrons will be collected when they accept an invitation to become a patron. Consent to the holding and processing of their personal data, under this Notice, will be a condition for patronships commencing on or after 25th May 2018.

The name and contact details of volunteers, employees and contactors will be collected when they take up a position, and will be used to contact them regarding Group administration related to their role. Further information, including personal financial information and criminal record information may also be collected in specific circumstances where lawful and necessary.

An individual's name, contact details and other details may be collected when they make a booking through the Group for an event, or at any time (including when booking tickets or at an event), in each case with their consent.

WHO HAS ACCESS TO PERSONAL DATA

Access to personal data is strictly limited to individual office holders with a specific need. For example:

- The Chairman (or, in his absence, the Vice Chairman) and Membership Secretary for the management and maintenance of choir membership lists, mailings to members etc.
- The Patrons Administrator for the management and maintenance of patronship records and for communications with patrons.
- The Treasurer for the management and administration of subscriptions, donations and standing orders.
- Details of orchestral players/musicians/soloists are held and processed by the Orchestral Manager /Musical Director

Everyone who has access to data, as part of AMC, has a responsibility to ensure that they adhere to the policies outlined in the Notice.

Where third-party Data Processors are used to process data on its behalf, AMC will ensure that they do so in compliance with GDPR.

WITH WHOM DOES THE GROUP SHARE PERSONAL DATA

The Group will not generally disclose information unless the individual has given their consent, or one of the specific exemptions under the GDPR or Data Protection Act applies. However, the Group make periodic returns to HMRC relating to those individuals who make donations to AMC, and have completed Gift Aid Declarations.

However, as a membership organisation, AMC encourages communication between its members. To facilitate this, members can request the personal contact details of other members, by writing to the Chairman or Membership Secretary. These details can be provided, as long as that member has consented to their data being shared with other members.

HOW LONG WE KEEP PERSONAL DATA

AMC will keep records for no longer than is necessary to meet the intended use for which it was gathered, subject to there being no legal requirement to keep the data for a longer period.

If you have any specific queries about how our retention policy is applied, or if you wish to request that personal data, which you believe to be no longer relevant, is considered for erasure, please contact the Compliance Officer. However, please bear in mind that the Group may have lawful and necessary reasons to hold on to some personal data even following such a request.

YOUR RIGHTS

Rights of Access etc.

Individuals have various rights, under GDPR and Data Protection Law, to access and understand data about them held by the Group, and to ask for it to be amended or erased, or for the Group to stop processing it in one, or more, or all ways – but subject to certain exemptions and limitations.

Any individual wishing to know what data the Group holds about them on its systems, or who wishes to amend their personal data, or who has some other objection to how their personal data is used, should put their request in writing to the Compliance Officer.

The Group will endeavour to respond to any such written request as soon as is reasonably practicable, and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The Group will be better able to respond quickly to smaller, targeted requests for information.

Requests That Cannot be Fulfilled.

You should be aware that the right of access is limited to your own personal data, and that certain data is exempt from the right of access. This will include information which identifies other individuals, unless such other individual has consented to such disclosure.

You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Consent.

Where AMC is relying on consent as a means to process personal data, any person may withdraw this consent at any time. However, it should be noted that withdrawal of a member’s consent to

hold and process their contact data may make it impossible for either the Group, or the Member, to fulfil their reciprocal rights and obligations. A similar situation applies with respect to a Patron and their continuing patronship.

Whose Rights?

The rights under Data Protection Law belong to the individual to whom the data relates.

DATA ACCURACY AND SECURITY

The Group will endeavour to ensure that all personal data, held in relation to an individual, is as up to date and accurate as possible. However, in doing so, it is largely dependent on members, patrons, employees, volunteers and contractors to provide its Compliance Officer, with updates to their contact details.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

The Group will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around the use of technology and devices, and access to our systems.