

## **Privacy Policy**

### Introduction

In order to operate, Surrey Philharmonic Society needs to gather, store and use certain forms of information about individuals.

These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the Society 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 Surrey Philharmonic Society's data protection standards and comply with the law.

## Why is this policy important?

This policy ensures that Surrey Philharmonic Society:

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protects the Society against the risks of a data breach

# **Roles and Responsibilities**

## Who and what does this policy apply to?

This applies to all those handling data on behalf of Surrey Philharmonic Society, e.g.:

- Committee members (i.e. the Trustees of the Registered Charity)
- Employees and volunteers, including orchestral deputies and "extra" players
- Members
- Contractors/3rd-party suppliers

It applies to all data that Surrey Philharmonic Society holds relating to individuals, including:

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

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

# **Data Protection Principles**

## 1. We fairly and lawfully process personal data

Surrey Philharmonic Society will only collect data where lawful and where it is necessary for the legitimate purposes of the Society.

A member's name and contact details will be collected when they first join the Society, and will be used to contact the member regarding Society membership administration and activities. Other data may also subsequently be collected in relation to their membership, including on their subscription payment history and any Gift Aid Declarations.

- The name and contact details of volunteers, committee members, employees and contractors will be collected when they agree to participate in an event or provide products or services, and will be used to contact them regarding Society administration related to their role.
  - Further information, including personal financial information and criminal-records information may also be collected in specific circumstances where lawful and necessary (e.g. in order to process payment to the person or in order to carry out a DBS check).
- Under some circumstances (e.g. when ordering tickets by telephone or on the internet) 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.
- 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 Surrey Philharmonic Society to communicate with them about Society activities, and/or for Direct Marketing. See 'Direct Marketing' below.

## 2. We only collect and use personal data for specified and lawful purposes.

When collecting data, Surrey Philharmonic Society will always explain to the subject why the data is required and what it will be used for, e.g.

"Please enter your e-mail address in the form below. We need this so that we can send you e-mail updates for the Society's administration including about rehearsal and concert schedules, subs payments and other relevant business."

We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to third parties without the explicit consent of the subject unless there is a legal requirement to do so.

### 3. We ensure any data collected is relevant and not excessive

Surrey Philharmonic Society will not collect or store more data than the minimum information required for its intended purpose.

E.g. we need to collect telephone numbers from members in order to be able to contact them about Society administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of Society administration.

#### 4. We ensure data is accurate and up-to-date

From time to time Surrey Philharmonic Society will ask members, volunteers and staff to check and update their data.

Any individual will be able to update their data at any point by contacting the Hon. Administrator.

#### 5. We ensure data is not kept longer than necessary

Surrey Philharmonic Society will review the data on individuals at the end of each season with a view to keeping such data for no longer than 12 months after our involvement with the individual has stopped

unless there is a continuing or legal requirement to keep records for a longer period. For example Gift Aid Declarations need to be kept for a number of years after the last reclaim of tax.

## 6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Hon. Administrator:

- Members, volunteers and supporters can request to see any data stored about them. Any such request will normally be actioned within 28 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will normally be actioned within 28 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will normally be actioned within 28 days of the request being made.

Members and supporters can object to any storage or use of their data that might cause them substantial distress or damage, or any automated decisions made based on their data. Any such objection will be considered by the Trustees, and a decision communicated normally within 28 days of the request being made

## 7. We keep personal data secure

Surrey Philharmonic Society will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment.
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- Physically-held data (e.g. membership forms or e-mail sign-up sheets) will be stored in a locked cupboard.
- Keys for locks securing physical data files should be returned to the Trustees by any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position.
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the Society. The Hon. Administrator will decide in what situations this is applicable and will keep a master list of who has access to data.

### 8. Transfer to countries outside the EEA

Surrey Philharmonic Society will not intentionally transfer data to countries outside the European Economic Area (EEA).

### Member-to-Member Contact

## We do not share members' data with other members

Nevertheless, as a membership organisation Surrey Philharmonic Society encourages communication between members. To facilitate this, while respecting privacy:

A Member (M) wishing to contact another Member (N) can compose an e-mail to N which they send to the Hon. Administrator, with the request that it be forwarded to N in order to establish contact, which can thereafter be continued directly on a personal basis by mutual agreement between M and N. This forwarding will normally be done, but the Hon. Administrator will have the discretion to refuse such requests if they are excessively numerous or of an otherwise obviously unwelcome nature.

# **Direct Marketing**

Surrey Philharmonic Society will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about Society news, fundraising and other Society activities.

Any time data is collected for this purpose, we will provide:

- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Surrey Philharmonic Society to send you e-mail updates with details about our forthcoming events, fundraising activities and opportunities to get involved')
- A method for users to show their active consent to receive these communications (e.g. a 'tick box')

Data collected will only ever be used in the way described and consented to (e.g. we will not use e-mail data in order to market third-party products unless this has been explicitly consented to).

Every marketing communication will contain a method whereby a recipient can withdraw their consent. Opt-out requests such as this will normally be processed within 28 days.

# Cookies on the Surrey Philharmonic web site

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a web site. It allows the web site to recognise that user's device and store some information about the user's preferences or past actions.

Surrey Philharmonic Society does not itself use cookies on its web site www.surreyphil.org.uk. However, there are links to third-party web sites, and these may use cookies. Surrey Philharmonic Society accepts no responsibility for the content or operation of any third-party web sites.