



## **Data Protection Policy**

### ***Introduction***

In order to operate, the Light Music Society (the “LMS”) needs to gather, store and use certain forms of information about individuals.

These can include members, suppliers, volunteers, audiences and potential audiences, charities and other groups with and for whom the LMS puts on events, business contacts and other people the group 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 the LMS’s data protection standards and comply with the law.

### ***Why is this policy important?***

This policy:

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

### ***Who and what does this policy apply to?***

This applies to *all* those handling data on behalf of the LMS, e.g.:

- Committee members
- Volunteers
- Members
- Contractors/3<sup>rd</sup>-party suppliers

It applies to all data that the LMS holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

### ***Roles and responsibilities***

*Everyone* who has access to data as part of the LMS has a responsibility to ensure that they adhere to this policy.

### **Data controller**

The Data Controller for the LMS is the Membership Secretary. They, together with the Committee are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

### *Key details*

- Policy prepared by: Jan Mentha
- Next review date: April 2019

## ***Data Protection Principles***

### **1. We fairly and lawfully process personal data**

The LMS will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name and contact details will be collected when they join the LMS, and will be used to contact the member regarding LMS membership administration and activities. Other data may also subsequently be collected in relation to their membership and attendance, including on their payment history for 'subs'.
- The name and contact details of committee members and other volunteers, 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 records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).

- An individual's name and contact details may be collected when they make enquiries about joining the LMS, the Library of Light-Orchestral Music or an LMS event. This may be used to contact them about future LMS events or joining the LMS.
- 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 the LMS to communicate with them about group 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, the LMS will always explain to the subject why the data is required and what it will be used for, e.g. when invited to join the LMS, the application form states:

*"Personal details provided by you on this form will be used to send you information for LMS administration, eg details of events being organised by the LMS, subscription payments, and other items of interest or relevance to members of the LMS. We will not pass on your details to third parties.*

*LMS's data protection policy is available on its website."*

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 3<sup>rd</sup> parties without the explicit consent of the subject.

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

The LMS will not collect or store more data than the minimum information required for its intended purpose.

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

We will not directly ask people to confirm their data; this is because the primary information we hold is members' addresses, to which the Magazine is sent to them throughout the year. If the address used is incorrect, we rely on the member in question to contact us to correct the information.

We will endeavour to check email addresses from time to time.

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

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

The LMS will keep data on individuals indefinitely for historical/archival purposes, and for so long as there is a legal requirement to keep records. We will not contact former members after their membership has expired.

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

The following requests can be made in writing to the Data Controller:

- Members, volunteers and supporters can request to see any data stored on about them. Any such request will be actioned within 30 days of the request being made.
- Members and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 30 days of the request being made.
- Members and supporters can request to stop receiving any marketing communications. Any such request will be actioned within 30 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 Committee, and a decision communicated within 30 days of the request being made

## **7. We keep personal data secure**

The LMS 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 email sign-up sheets) will be stored in a location that is not ordinarily accessible by the public
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the group. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data

### ***Transfer to countries outside the EEA***

The LMS will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual (e.g. USA).

### ***Direct Marketing***

The LMS will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities. When contacting such people, the message will contain a method for users to discontinue receiving these communications.

Data collected will only ever be used directly by the LMS; we will not use email data in order to market 3<sup>rd</sup>-party products unless this has been explicitly consented to).

### **Cookie Policy**

The LMS website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the [About Cookies](#) website, which offers guidance for all modern browsers.