



## Brighton Festival Youth Choir – Privacy Notice

**Brighton Festival Youth Choir** is committed to protecting your personal data and will use any personal or sensitive (special category) data we collect from you in line with the General Data Protection Regulation (UK-GDPR) & Data Protection Act 2018. This policy has been compiled by the trustees to ensure that as a charitable organisation Brighton Festival Youth Choir (BFYC) meets its legal obligations under the relevant data protection legislation and follows recognised good practice in the processing and protection of personal and organisational data. **(See Appendix 1)**

### What the legislation requires

Current data protection legislation (as above) covers most manual records (files, letters, and paper records etc) as well as any electronic records and electronic channels of communication (email, telephone, and fax). The introduction of the UK-GDPR / Data Protection Act (2018) & e-privacy directive (Privacy & Electronic Communication Regulations 2003) means that BFYC now has significantly more legal liability should it be held responsible for a data breach.

### What is this guide for?

Whenever we need to collect & process any of your data, we will let you at that point *why* we need to do so and *what* it will be used for, but this guide provides an overview of all of those situations and provides more detail on how we keep your data secure and up to date, how long we might hold it for, and what your rights are in relation to it.

### Who's responsible for data the group collects?

Brighton Festival Youth Choir is a Data Controller under the UK-GDPR. Brighton Festival Youth Choir's Data Protection Officer is the Chair of Trustees who can be contacted at [bfyc@hotmail.co.uk](mailto:bfyc@hotmail.co.uk).

### What data do we collect and what do we use it for?

Brighton Festival Youth Choir collects personal data from individuals to help us plan, organise and run the day-to-day operations of the choir (e.g., co-ordinating rehearsals or collecting subscription payments) and to promote and market the group's activities (e.g., marketing mailing lists and photography/video capture).

### What is our lawful basis for processing your personal information?

The personal information/data we collect must comply with legal requirements. (UK-GDPR)

- That you **consent** to us using the data you've provided
- Processing and managing event tickets – it is necessary for the performance of a **contract**
- Processing is necessary for compliance with a **legal obligation**
- In respect of 'sensitive data' – we will use a condition of processing to protect your vital interests or meet a legal obligation

### Members: for administering membership

When you join Brighton Festival Youth Choir as a member, or during your membership with us, we may need to collect some of the following information on you:

|   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Address</li> <li>• Emergency contact details</li> <li>• Medical information (<b>Special Category data - see below</b>)</li> </ul> | <ul style="list-style-type: none"> <li>• Dietary / Access Requirements</li> <li>• Gift Aid Declarations</li> <li>• Age/gender</li> <li>• Digital Information (photos/videos)</li> <li>• Relevant Experience</li> </ul> |
|---|--|

### **Sensitive information (Special Category Data)**

As part of our activity planning processes, we may ask you for sensitive information about any medical needs you may have. This information is required to ensure that we can provide access to our activities, and to make sure that participants are safeguarded while in our care. By supplying us with this information you are providing your consent for us to process it just for this purpose.

As with all personal information we hold, sensitive information is held securely and restricted to those who need to use it. We will delete sensitive information when we no longer need it

This data will be used by trustees to manage your membership with Brighton Festival Youth Choir and to organise and run our activities. If you provide consent; we would like to use your contact details to send you marketing/promotional communications from the group. **(Please see opt-in for marketing)**

Any marketing/promotional communication we send you will include a clear option to withdraw your consent (e.g., to 'opt out' of future emails) and you can also withdraw consent at any point by contacting the Data Protection Officer - the Chair of Trustees C/O [bfyc@hotmail.co.uk](mailto:bfyc@hotmail.co.uk).

### **Event attendees: for processing and managing tickets for events**

In the event of own-promotion ticketed events, we need to collect data on the person booking (name and email) to allow you access to the event and to send you a confirmation of your reservation/purchase. This data will only be used for administering your access to the event/s for which you have booked and will *not* be used to send you marketing/promotional messages from the group unless you have also provided your consent to receive these (see below).

### **Employees and contractors: for administration and legal/regulatory purposes**

We may require (for administration or for legal/regulatory reasons) to collect personal or sensitive data on employees or contractors of the group. Where this is the case, we will explain what this is for at the point of collection.

### **Mailing list subscribers: for marketing and promotion**

We offer everybody the opportunity to sign up (consent) to receive marketing and promotional information on the group's activities (e.g., emails about forthcoming events).

When you sign-up to our mailing list we will ask for your name, email, phone number and address and will use this data to send you information about our events and activities as and when they happen (e.g., forthcoming performances, social events, and fundraising events). We may also ask you how you would like to receive this information. This allows us to tailor the information we provide to suit your preferences (e.g., email vs post).

We will *only* send you information that is related to the group (e.g., we will *not* use your data to send you marketing messages from 3<sup>rd</sup> parties).

Anything we send you will include a clear option to withdraw your consent (i.e., to 'opt out' of future communications) and you can also do so at any time by contacting the Data Protection Officer: the Chair of Trustees C/O [bfyc@hotmail.co.uk](mailto:bfyc@hotmail.co.uk).

### **Website visitors:**

Access to BFYC's webpage is via Brighton Festival Chorus' website who have a separate Privacy Policy: <https://bfc.org.uk/newsletter-privacy-policy/>

### **Do we share your data with anyone else?**

We will restrict any disclosures, other than those made with your consent to those third parties which are necessary to fulfil the above purposes, e.g., the Charities Commission or HMRC for Gift Aid purposes.

We will never pass or sell your personal data on to third parties for marketing purposes.

We will always make sure any third parties we use are reputable, secure, and process your data in accordance with your rights under the UK-GDPR.

### **Special measures for children's data**

Where we knowingly collect or store data of children **under 13** we will ensure the person with parental responsibility for the child has seen the relevant information relating to the child data or has given consent on behalf of the child.

Once a child is over 13 years old, parental consent to use their data will no longer be sufficient. We will only continue to hold/use the data if the child *themselves* also gives their consent.

### **How can you update your data?**

You can contact us at any time at [bfyc@hotmail.co.uk](mailto:bfyc@hotmail.co.uk) to update or correct your **personal data**.

### **How we store your personal information and keep it safe**

We take the care of your personal data seriously, and protect in a variety of ways, including secure computers, virus protection, firewalls, password protection and encryption, followed by robust procedures, up to date technology and software. We operate a policy of restricted password-controlled access to any of your information stored on our systems

### **We do not transfer data outside the United Kingdom**

### **How long we will hold your data?**

The Brighton Festival Youth Choir data retention policy is to review all data held on individuals at least every two years and remove data where we no longer have a legitimate reason to keep it.

(Information about this is controlled by our Data Retention documents & Record of Processing Activities (RoPA))

Where you have withdrawn your consent (opted out) for us to use your data for a particular purpose (e.g., unsubscribed from a mailing list) we may retain **some** of your data for up to two years in order to preserve a record of your consent having been withdrawn.

### **What rights do you have?**

Under the UK-GDPR, you have the following rights over your data and its use:

- The right **to be informed** about what data we are collecting on you and how we will use it
- The right of **access** - you can ask to be provided with a copy of the data we hold on you
- The right to **rectification** - you can ask that we update or correct your personal data
- The right to **object** - you can ask that we stop using your data for a particular purpose
- The right to **erasure** - you can ask us to delete the data we hold on you
- The right to **restrict processing** - you can ask that we temporarily stop using your data while the reason for its use or its accuracy are investigated
- Though unlikely to apply to the data we hold and process on you, you also have rights related to **portability and automated decision making** (including profiling)

All requests related to your rights should be made to the Data Protection Officer at [bfyc@hotmail.co.uk](mailto:bfyc@hotmail.co.uk) We will respond within one month.

You can find out more about your rights on the [Information Commission's Office website](#).

**What will we do if anything changes?**

If we make changes to our privacy statements or processes, we will post the changes here. Where the changes are significant, we may also choose to email individuals affected with the new details. Where required by law, we will ask for your consent to continue processing your data after these changes are made.

**Reviewing the Privacy Policy**

This policy will be regularly reviewed by the Trustees, will be posted on the BFyC webpage via the BFC public website, and will be included in the pack given to all new members.

**Appendix 1**

As a charity we are permitted to collect data about individuals to support the following areas:

1. Administration
2. Fundraising
3. Realising the Objectives of a Charitable Organisation
4. Accounts & Records
5. Advertising, Marketing & Public Relations
6. Information and Databank Administration
7. Journalism and Media
8. Processing for Not-for-Profit Organisations
9. Research
10. Volunteers

Reviewed January 2023



Signed:

Wendy Forbes (Chair of BFyC Trustees) 31/01/2023