



# DATA PROTECTION POLICY

## Issue 2

### **1. Introduction**

In delivering its charitable purpose, Amersham Band processes the personal data of its members, supporters, donors and the general public. This data is collected and used by the management committee of the band and shall be handled in accordance with the General Data Protection Regulation (GDPR). Amersham Band's Data Protection Policy describes what personal data is collected, where it is stored, who can use it and how the rights of individuals are protected.

Individual band members may have collected and stored personal data, for example email addresses or phone numbers of band members, friends or other contacts which they use for their personal use, not directly associated with the management of the band. Such data is not the subject of this policy.

### **2. What personal data is collected**

The band collects the following personal information; name, address, phone number(s), email address, IP address, date of birth, and emergency contact information.

The band does not collect sensitive personal information as defined in the GDPR. This includes data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

The bandroom has a 24-hour CCTV system monitoring the outside of the building for crime prevention purposes. This records all arrivals, departures and activities on the bandroom site. The recorded CCTV footage is automatically overwritten on a 7-14 day cycle.

### **3. Use of personal data**

The personal data is collected and processed by members of the Amersham Band Management Committee and associated Sub-Committees for the purposes of operation of the band, for management of the band's activities, for fundraising, for marketing and for general communications.

The personal data shall be used in accordance with the permission to use the data given by individuals. The personal data shall not be used for any other purpose and shall not be provided to third parties, except that the data of band members may be shared with Brass Band Players Ltd. and other brass band contest organisations in order to comply with registration requirements for contests.

Personal data shall only be stored for the period for which it is required, for example for the duration of membership tenure. Data which is no longer required, or which is out of date shall be deleted.

CCTV data may be provided to the police or other authorities if they lawfully request the data.

#### **4. Where the personal data is stored and who has access to it**

Personal data is used by the members of the Amersham Band Management Committee and associated Sub-Committees. Amersham Band does not own any IT equipment for data processing. Personal data is stored on the personal computers of Committee Members and some personal data is also stored on a shared Google Drive and the Muzodo on-line scheduling tool. Personal data which is collected from the band website, such as queries, on-line purchases and box-office bookings is stored on the website server.

The following policies apply to the storage and sharing of this data.

1. Personal data stored on personal computers shall be protected by a login and password security mechanism. In the case where the personal computer is accessible to other parties, the individual files containing personal data should be password protected.
2. Personal data shall not be copied to, or transferred by, usb stick (or other portable storage) unless the files are password protected.
3. When using email address lists, for example to communicate to all band members, the blind copy (bcc) function should be used for individual email addresses, such that the distribution list is hidden from recipients.
4. Personal data held on the Google Drive shall be password protected and accessible only to authorised committee members. Access permission is controlled by the band's Google Drive administrator.
5. Personal data held on the website server shall be password protected and accessible only to authorised committee members. Access permission is controlled by the band's website administrator.
6. Personal data which is held on paper records shall be stored in a safe location, for example at the committee member's home. Where personal data is carried outside of this location, to a band rehearsal, event, or contest, the personal data must be considered as confidential and kept in the committee member's possession at all times.
7. When committee members cease to serve on the committee, any personal data they hold shall be deleted.
8. Personal data may be shared with other committee members for the purposes of management of the band.

CCTV video footage is stored in a secure location in the bandroom and is accessible only by an authorised person. Access to the data is password protected.

## **5. Permission to use the data**

Prior to collecting personal data, permission shall be obtained from each individual to store their data and to contact them. Such permission may be gained by use of the membership form, or other means. This is an opt-in process, permission should not be assumed.

## **6. Rights of individuals**

Individuals have the right to see what personal data has been stored. When a request to see personal data is received, one committee member will coordinate the response and will ask all other committee members to provide their relevant stored data for collection into a single response to the request.

Individuals have the right for their personal data to be removed from use by the band and for their history to be deleted. When a request for removal of personal data and/or history is received, one committee member will coordinate the response and ask each committee member to delete the relevant data. The individual concerned will be notified that their personal data and/or history have been deleted.

Individuals have the right to ask for their personal data to be changed. When a request to change personal data is received, one committee member will coordinate the response and will ask all other committee members to change the relevant stored data. The individual concerned will be notified that their personal data has been changed.

## **7. Registration with the Information Commissioners Office**

Amersham Band is a not-for-profit organisation which only processes information necessary to provide or administer activities for people who are members of the organisation or who have regular contact with it. The band will comply with the registration requirements of the information commissioner's office (ICO). Registration is required for the operation of the CCTV system at the bandroom site.

## **8. Maintenance, audit and review**

An initial audit has been carried out to identify what personal data is being held and for what purpose. Such an audit may be repeated from time to time.

It is the responsibility of individual committee members to maintain accurate data, and to delete data which is no longer required.

The committee will review this policy every two years.

## **9. Document History**

22 December 2017	Policy drafted and circulated for initial review
9 January 2018	Updated draft with permission annex
12 January 2018	Changes made after discussion at Management Committee
23 February 2018	Issue 1
19 December 2020	Issue 2. Provisions for CCTV added.



