



Data Protection Policy

Introduction

In order to operate, the Cambridge Concert Orchestra (the 'CCO') 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 CCO puts on events, business contacts and other people the CCO has a relationship with or regularly needs to contact.

This policy explains how these data should be collected, stored and used in order to meet the CCO's data protection standards and comply with the law.

Why is this policy important?

This policy:

- Protects the rights of our members and supporters
- Complies with data protection law and follows good practice
- Protects the CCO 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 CCO, e.g.:

- Committee members
- Members
- Contractors/3rd-party suppliers

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

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

Roles and responsibilities

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

Questions regarding this policy and data protection

Any questions relating to this policy or the collection or use of data by the CCO should be directed to: info@cambridgeconcertorchestra.org

Data Protection Principles

1. We fairly and lawfully process personal data

The CCO will only collect data where lawful and where it is necessary for the legitimate purposes of the group. The CCO ordinarily collects data from two types of people: (1) members and (2) supporters.

(1) Members

- A member's name and contact details will be collected when they join the CCO and will be used to contact the member regarding CCO 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'.

(2) Non-members (who the CCO will treat as supporters)

- An individual's name and contact details may be collected when they make enquiries about joining the CCO. This may be used to contact them about future membership opportunities or to deputise at a concert and/or for Direct Marketing. See 'Direct Marketing' below.
- An individual's name and contact details may be collected when they make enquiries about a CCO event. This may be used to contact them about the event in question, including purchasing tickets.
- 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 CCO to communicate with them about CCO 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 from members, the CCO will always explain to the subject why the data are required and what they will be used for, e.g. when invited to join the CCO, the application form states:

Personal details provided by you on this form will be used to send you: (1) during your membership, information for CCO administration, e.g. rehearsal and concert details, subscription payments, and other items of interest or relevance to the CCO; where you have agreed, your information will be shared with other members of the CCO; (2) after you leave, information promoting concerts, updating you about CCO news, fundraising and other CCO activities; you may unsubscribe from this at any time. We will not pass on your details to other third parties. The CCO'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, e.g. we will never pass on personal data to 3rd parties without the explicit consent of the subject.

3. We ensure any data collected are relevant and not excessive

The CCO will not collect or store more data than the minimum information required for its intended purpose, e.g. we need to collect email addresses, postal addresses and telephone numbers from members in order to be able to contact them about group administration, but data on their marital status or sexuality will *not* be collected, since it is unnecessary and excessive for the purposes of group administration.

4. We ensure data are accurate and up-to-date

The CCO will ask members to check and update their data on at least an annual basis. Any individual will be able to update their data at any point by contacting the Data Controller.

5. We ensure data are not kept longer than necessary

The CCO will keep data on individuals indefinitely for historical/archival purposes and for so long as there is a legal requirement to keep records. However, once your membership has expired, we will (unless you agree otherwise) reduce communications to marketing communications only, which you can opt out of at any time.

Key details

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

6. We process data in accordance with individuals' rights

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

- Members and supporters can request to see any data stored on or 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 are 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 CCO will ensure that data held by us are kept secure.

- Electronically-held data will be held within a password-protected and secure environment.
- Physically-held data will be stored in a location that is not generally accessible to the public and in such a way that it is not readily visible.

Transfer to countries outside the EEA

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

Member-to member contact

As a membership organisation, the CCO encourages communication between members. To facilitate this, a Membership List containing contact data of other members who have agreed that their details can be shared is available to all members.

Direct Marketing

The CCO will occasionally collect data from consenting supporters (including ex-members) for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities.

We will not use email data in order to market 3rd-party products unless this has been explicitly consented to. Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.