

# Sands Singers Privacy Policy

Sands Singers Community Choir is an organisation based in Woburn Sands, Bedfordshire, UK. The choir has a membership drawn from Woburn Sands and the surrounding district, members join for a period of one term (there are three terms per year) and pay a small fee. The Choir has a written constitution, a bank account with published accounts, an elected committee and holds an Annual General Meeting, in addition the Committee holds formal minuted meetings throughout the year.

The choir does not have a postal address but may be contacted through the email address **sandssingers@gmail.com**.

This document is the Privacy Policy for Sands Singers Community Choir ('The Choir'). It has been created and is maintained by the Committee as part of the measures to comply with the GDPR.

## Overview

The Choir collects, stores and processes some personal information of choir members and is committed to maintaining the privacy of this information. It is also committed to having only a minimum of such information as needed for the efficient operation of The Choir; this includes membership, financial accounting, mustering of choir members for rehearsals and events including cancellations, dissemination of information, soliciting feedback from members of The Choir, collection of property of The Choir and, the business of the Committee.

## Data Controller

The Sands Singers Community Choir is the Data Controller. This role is enacted through the elected Committee of the choir which will publish this Privacy Policy and maintain oversight of compliance through its regular committee meetings on an as-needed basis.

## Data Processor

Certain data of members of The Choir may be stored and processed by third parties on behalf of the Data Controller.

The Data Processors are:

Data Type	Data Processor	Notes
Email addresses of Choir members (this is ordinary members, not committee members)	The email service currently used for email to Choir Members is the <b>Yahoo cloud service</b> .	
Details pertaining to members payment of choir fees by online banking (BACS) into the Choir bank account	The <b>Natwest Bank online banking</b> facilities are used by the Choir.	
Official choir videos which will show images of choir members	The Choir has a <b>YouTube</b> channel which is administrated by the Webmaster	
Official choir videos or photos	The Choir has a <b>Facebook</b> page	<i>Choir members and members of</i>

which will show images of choir members	which is administrated by the Webmaster	<i>the public may post information to the page. The page content is not moderated by the Choir.....</i>
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## Website and online presence, cookies

### Website & Cookies

The [www.sandssingers.co.uk](http://www.sandssingers.co.uk) is a simple website which is used to only present information about the choir. It is not used to collect information of persons.

The only cookie used is DYNSRV which is a session cookie. This is used for session load balancing and is an essential cookie to the operation of the site that is always set by the load balancer and does not store any personal information.

The Choir website [www.sandssingers.co.uk](http://www.sandssingers.co.uk) runs some simple visitor number analytics via the webhosting facility and therefore will collect the **ip address** of the visitor. The ip address or any personal information about the visitor is NOT available to the Choir or to the Webmaster of the Choir, only anonymised information about site visitors is available.

The website may present information of identifiable members of The Choir (including ex-members) or other persons, this will generally be in the form of photos or videos of events held by or attended by The Choir. These may be provided through a linked on-line facility such as YouTube. A notice will be displayed at official choir events, such as concerts, to the effect that photos/videos may be taken.

### Facebook

The Choir has a Facebook 'Page'. This is linked to the YouTube account of a member of The Choir who acts as the Admin of the page, which is the usual mechanism for such pages. Members of The Choir and the public may post information including photos to this page. The purpose of the page is to provide a simple and easily accessible means to share information that may be of interest to members of The Choir or members of the public. Use of this facility by anybody, whether posting or reading, is subject to the terms of Facebook. Content posted to the page is not controlled by the Admin, the site is not moderated.

### YouTube

The Choir has a YouTube Channel. This is linked to the YouTube account of a member of The Choir who acts as the Admin of the channel, which is the usual mechanism for such pages. Members of the Choir and other users of YouTube may access the videos that are posted or linked on the channel. Videos of choir performances and other events may be posted onto this channel by the Admin of the channel. Use of this facility by anybody is subject to the terms of YouTube. Only the Admin can upload video content to this channel, however anyone may post comments to the channel.

## **Membership Information**

The Choir collects the necessary minimum of personal information and processes it in order to support the efficient management of the choir; this is regarded as a 'legitimate interest' of the Choir. The committee is committed to protecting the personal information of the members.

The personal information we collect is provided by the member upon joining the Choir and consists of:

- Name
- Contact phone number
- Postal address
- Email address
- Singing voice type

The Choir does not normally collect Personal Sensitive information, but if it is necessary to collect it the Choir will ask for consent to use it.

### Who can see this information?

The information is held by the Membership Secretary. The information may be seen by other members of the committee for specific Choir purposes and where agreed and supervised by the Membership Secretary.

Members' information will not be shared with any other organisation or person other than when mandated by UK law enforcement agencies.

What if someone asks for my details or email address? The Choir will never provide details to another party. If someone asks for your details we will send their request to you so that you may reply to them.

### What happens if I let my membership expire?

Membership of The Choir is on a termly basis and fees are paid each term. Membership details will be held for TWO YEARS to allow continuity and allow The Choir to continue to contact you in the following way: (1) to send you information about The Choir such as new terms dates and upcoming events (2) to allow The Choir to contact you in order to return choir property such as music scores you may have been issued with.

Ex- members of The Choir can still contact The Choir via sandssingers@gmail.com to confirm their details are no longer held by The Choir. In addition ex-members can contact The Choir prior to the TWO YEAR cut off to ask for their details to be deleted.

## **The Choir Committee**

Some members of the Choir are members of the Committee. Committee member names will be shared with the other members of the committee and may be publicised to the ordinary members of the Choir and on public forums such as the website. Where it is required for choir business to share

the personal phone number or email address of a committee member to a third party, permission will be required.

### **Use of Email**

Where a member provides their email address to the Choir the Choir will in accordance with their LEGITIMATE INTEREST send emails to the member. It is the legitimate interest of the choir to be able to inform its members of information that is needed for the smooth and efficient running of the Choir. This includes information about Choir events, including but not limited to mustering for rehearsals and concerts and other events, term times and fees, music schedules and availability of scores, meetings and AGMs, official social events, and retrieval of Choir property such as music scores.

Where the member has given permission to receive information about other matters then this may also be provided by email.

The Membership Secretary is responsible for maintaining the email distribution list. Emails to the ordinary Choir members are to be sent by only the Membership Secretary. 'Blind Copy' mode is used so that email addresses are not shared.

Committee members are deemed, by acceptance of their position, to receive any emails that are necessary for the efficient running of the committee and choir. On a day to day basis the Membership Secretary determines whether and how information should be sent to members by email.

Member's emails addresses will not be shared with other persons or organisations.

### **Bank Information**

The Choir uses Natwest bank, including its online banking facility. The online banking facility is only accessible through use of the normal bank logon facility with password being known only to the current Treasurer. Members may elect to pay their fees by BACS into the natwest account. This *may* mean that the Treasurer can see member information such as sort code and account number. This information may form part of online or printed statements and may reside on printed files. Such files are kept as private documents by the Treasurer but may be shared with our accountant (if used). These details are never shared with anybody else. Furthermore, the Choir DOES NOT keep a separate record of member's bank details.

### **Data Breaches**

In the event of a data breach where unauthorised access has been made to access member's personal data, all members will be informed by the committee.

If you are unhappy with the way your data has been used you can complain yo the Information Commissioner's Office at <https://ico.org.uk>

End of document.