

# General Data Protection Policy

## 1. Introduction

1.1 Village Voices (hereinafter called VV) is a community choir which exists for the benefit of its members to enjoy the pleasure of singing and to raise money for charity by the production of concerts.

1.2 In order to operate, VV needs to gather, store and use certain forms of information about individuals. This can include choir members, paid professionals (musical director and/or accompanist), suppliers, volunteers, audiences and potential audiences, business contacts and other people the choir has a relationship with or regularly needs to contact.

1.3 This policy explains how this data may be collected, stored and used in order to meet VV's data protection standards and comply with the General Data Protection Regulations (GDPR) which, since 1st January 2021, are called the United Kingdom GDPR (UKGDPR).

## 2. Purpose of the Policy

- 2.1 This policy is produced to ensure that VV:
- Protects the data rights of its members, volunteers and supporters.
  - Complies with data protection law and follows good practice.
  - Protects the choir from the risks of a data breach.

## 3. Who does this policy apply to?

- 3.1 This policy applies to all those handling data on behalf of VV, namely:
- Committee members
  - Paid Professionals
  - Choir Members
  - Volunteers

## 4. What does this policy apply to?

- 4.1 This policy applies to all data that VV holds relating to individuals, including:
- Names
  - Email addresses
  - Postal addresses
  - Phone numbers
  - Any other personal information held (e.g. financial)
  - Emergency Contact (ICE) names and telephone numbers

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### 5. Roles and responsibilities

5.1 GDPR creates two distinctive roles:

- Data Controller – *defined as a legal or natural person, an agency, a public authority, or any other body who, alone or when joined with others, determines the purposes of any personal data and the means of processing it.* (i.e. the person or persons who set the policy for data collection and storage).
- Data Processor – *defined as a legal or a natural person, agency, public authority, or any other body who processes personal data on behalf of a data controller* (i.e. the person or persons who implement the policy set by the Data Controller on a day-to-day basis).

5.2 For the purposes of VV and this policy:

- the role of Data Controller will be fulfilled jointly by the VV Committee.
- the role of Data Processor will be fulfilled jointly by the VV General Secretary and the VV Membership Secretary.

5.3 The appointment of these roles does not affect the overriding principle that everyone who has access to data as a member or administrator of VV has a responsibility to ensure that they adhere to this policy.

### 6. Data protection principles

6.1 Data will be collected in a lawful and transparent way and where it is necessary for the legitimate purposes of the choir.

6.2 Data will only be collected for specific and legitimate purposes

6.3 When collecting data, VV will provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

6.4 VV will not collect or store more data than the minimum information required for its intended purpose. (See para 4.1 for details of data).

6.5 VV will ensure that all data is accurate and up to date. Members, paid professionals and volunteers will be asked to check and update their data on a biannual basis.

In the interim, an individual will be able to amend their data at any point by contacting the General Secretary or the Membership Secretary.

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6.6 VV will ensure that an individual's records are kept no longer than necessary. When the intended use is no longer applicable (e.g. when a member leaves the choir), the data will be deleted within a reasonable period unless there is a specific reason for retaining the data (e.g. a member takes a temporary leave of absence intending to return at a later date).

6.7 Data will be kept secure.

- Electronically held data will be kept within a password protected and secure environment.
- Access to the data will only be given to relevant choir personnel where it is necessary for the administration of the choir.
- Access to electronic data files will be removed and denied whenever an individual with data access leaves their role/position.

## **7. Rights of the Individual**

7.1 When VV collects, holds and uses an individual's personal data that individual has the following rights over their data.

- The right to be informed about what data is collected and how it is used.
- The right of access - an individual can ask to see the data stored on them.
- The right to rectification – an individual can ask that their data is corrected and updated.
- The right to object – an individual can ask that their data is not used for a particular purpose.
- The right to erasure – an individual can ask for their data to be deleted.
- The right to restrict processing – an individual can ask that their data ceases to be used while the reason for its use or its accuracy are investigated.
- An individual also has rights relating to portability and automated decision making (including profiling).

7.2 VV will ensure its data processes comply with these rights and will make all reasonable efforts to fulfil requests from an individual in relation to these rights.

## **8. Marketing**

8.1 VV may occasionally collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about choir news, fundraising and other choir activities.

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8.2 Whenever data is collected for this purpose, the choir will provide:

- An explanation of what the data will be used for (e.g. 'VV would like to send you email updates with details about the choir's forthcoming events, fundraising activities and opportunities to get involved').
- A method for users to show their positive and active consent to receive these communications or, conversely, an opportunity for them to show they no longer wish to receive them.

8.3 Data collected by this method will only ever be used in the way described. It will never be sold or distributed to any 3<sup>rd</sup> party unless on the specific written request or permission of the individual involved.

## **9. Review Date**

9.1 This policy is reviewed every 2 years.  
Next Review Date: October 1<sup>st</sup> 2026