

Richmond Orchestra Data Retention Policy (including Privacy Policy)

For the purposes of demonstrating accountability and business transparency for Richmond Orchestra to manage and retain playing-members (including conductor and leader) and non-playing members personal information, the following Data Retention Policy outlines:

- 1) What personal information is held by Richmond Orchestra for subscribers
- 2) How the personal information is stored and used (Which apply to Richmond Orchestra Privacy Policy)
- 3) Who will be responsible for the personal information
- 4) Actions by Richmond Orchestra to obtain consent
- 5) How an individual can update or withdraw consent.

This Data Retention Policy also includes our Privacy Policy.

Richmond Orchestra identifies the lawful basis for processing data as:

- Legitimate interest (for Playing Members including Conductor and Leader)
- Consent (for Playing-members including Conductor and Leader and non-playing members)

Definitions and key business information are set in the Appendix on page5.

1. Information held by Richmond Orchestra for subscribers

Richmond Orchestra identifies two categories of subscribers to the organisation:

- i) playing-members (including conductor and leader)
- ii) non-playing members.

The two categories require separate information held.

The following Information Asset Registers (IAR) lists the personal data types which Richmond Orchestra may hold on a subscriber. Richmond Orchestra may hold all or some of the personal data types and it is optional for either subscription to provide any or all fields listed.

i) *Playing-members (including conductor and leader) IAR:*

- ❖ First Name
- ❖ Surname
- ❖ Email
- ❖ Instrument (inc. section)
- ❖ Bank details (if applicable, for repaying expenses and fees)
- ❖ Telephone number
- ❖ Mailing address
- ❖ Postcode
- ❖ Photography from concerts and rehearsals for publicity or social media.

ii) *Non-playing members IAR:*

- ❖ First Name
- ❖ Surname
- ❖ Email
- ❖ Mailing Address
- ❖ Postcode
- ❖ Telephone number.

2. How information is stored and used by Richmond Orchestra (Which apply to Richmond Orchestra Privacy Policy)

Storage

Information is held primarily by Richmond Orchestra in digital format. Some previous information held is printed and filed manually. These files are kept by the presently named chairperson.

'Playing-members (including conductor and leader)' data will be kept on a secure web-server and as a digital database file.

'Non-playing members' data will be kept on a digital database file or included in manual filing.

All information will be kept as long as it is needed, or until an individual requests to update/withdraw consent and unsubscribe.

'Playing-members (including conductor and leader)' information will be held until they decide to retire from the orchestra.

Richmond Orchestra will regularly assess the Information Audit and Information Asset Registers to store only what's required.

Use of data

For both subscribers to the organisation, there are independent requirements for use of data by Richmond Orchestra as listed below.

'Playing-members (including conductor and leader)':

- Orchestra communications, including:
 - ❖ Membership status (Including subscriptions)
 - ❖ Rehearsals
 - ❖ Concerts (including charity events)
 - ❖ Playing opportunities sent to us by other music groups
 - ❖ News about present and past members
 - ❖ Questionnaires for feedback (eg, appointment of new conductor)
 - ❖ Any structural changes or new appointments to the organisation
 - ❖ Any updates to our policies
- Applying for Gift Aid on subscription payments
- Repaying expenses, if applicable
- Photography for use on publicity and social media

'Non-playing members':

- Orchestra communication, including:
 - ❖ Future concerts or events
 - ❖ News of the Friends Scheme
 - ❖ Occasional questionnaires
 - ❖ Any structural changes or new appointments to the organisation
 - ❖ Any updates to our policies
- Applying for Gift Aid on any charitable donation made to the orchestra

Information provided to Richmond Orchestra by both subscription categories will not be shared with any third party organisations without the consent of the individual or unless otherwise stated by law.

By default, Richmond Orchestra's preferred communication is by Email. If this method is not available, second preference of communication is by text, followed by telephone and last resort by postal address.

An Email provider platform will be used to Email both subscription categories.

Please-note: Email providers, such as MailChimp, work under their own data and privacy notice. Their service to registered accounts include collated data on the activity of persons included on the mailing list. Examples of collated data are: count, date and time Email was opened; count, date and time links were followed; web-server used; and, whether a desktop or mobile was used to view the Email. If you're concerned about your privacy through this means please contact the named Chairperson or member of the committee.

The main purpose for Richmond Orchestra using an Email provider is to digitally gather subscriber preference and consent. Any additional information provided by the Email provider will be used to draw conclusion on the success of the Email correspondence.

3. Who is responsible for the use of information

The information databases held by Richmond Orchestra will be managed by both the 'Data-Controller' and 'Data-Processor'. The 'Data-Controller' may also be the 'Data-Processor'.

Data-Controller

Richmond Orchestra have identified the 'Data-Controller' as whoever is named as the present Chairperson of the organisation. Responsibility as 'Data-Controller' will be duly stated with any change of Chairperson. The 'Data-Controller' determines the purposes and means of processing personal data.

Data-Processor

Richmond Orchestra have identified the 'Data-Processor' as a specified member of the committee who will be responsible for updating the database and Information Asset Register (IAR). The 'Data-Processor' may be one or several members of the committee who demonstrate good purpose to access and use the information held, ie, Chairperson, Secretary, Treasurer, Manager, Publicity and Communications.

4. Actions to obtain consent

Richmond Orchestra will keep records of what both subscription categories have consented to, and when and how consent was given.

Richmond Orchestra will ensure that consent requests are sought with a positive opt-in such as unticked opt-in boxes or similar, and will never make consent a precondition of service.

Both subscription categories to Richmond Orchestra will be given individual choice to consent to the different purposes and types of use of personal data wherever appropriate.

5. How to update or withdraw consent

Richmond Orchestra will duly comply with any request from either subscription group to update or withdraw consent at any time.

For any update or withdrawal of consent from any individual, Richmond Orchestra will request formal notification.

Richmond Orchestra categories for informal and formal notification:

Informal

- ❖ Verbal
(in person or telephone)

Formal

- ❖ Email
- ❖ Postal
- ❖ Unsubscribe
- ❖ Text message

'Playing-members (including conductor and leader)' who decide to retire from the orchestra will need to formally communicate their intentions to leave to a member of the committee. 'Playing-members (including conductor and leader)' upon leaving can request to be listed as a 'Non-playing member' for communication benefits.

Appendix

1. Richmond Orchestra registered address: *contact the present chairperson to obtain*
2. Richmond Orchestra registered charity number: 276187
3. Definitions:
 - 3.1. Data-Controller - a data-controller is the person within the organisation who determines the purposes and means of processing personal data
 - 3.2. Data-Processor - a data-processor is the person(s) within the organisation responsible for processing personal data on behalf of a controller
 - 3.3. Data - facts and statistics collected together for reference or analysis
 - 3.4. Personal Data - any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier
 - 3.5. Sensitive Data - refers to sensitive personal data included in the GDPR 'special categories' which specifically include genetic data, and biometric data where processed to uniquely identify an individual
 - 3.6. Information Asset Register (IAR) - identifies the information asset type retained by Richmond Orchestra and states how long information assets will be retained, who can access them and whether they contain personal data
 - 3.7. Information audit - identifies the data that Richmond Orchestra processes and how it flows into, through and out of the organisation
 - 3.8. Accountability - to be able to show how Richmond Orchestra comply with the GDPR principles, for example by having effective procedures and guidance
 - 3.9. Consent - refers to offering people genuine choice and control over how Richmond Orchestra use their data.