

The Yorke Trust

Data Privacy Statement

OVERVIEW

Introduction

The Yorke Trust (which hereafter will be referred to as YT), needs to gather, store, and use certain information about individuals, in order to operate. This can include supporters, course participants, hirers, volunteers, host families, business contacts and other people with whom YT has a relationship or regularly needs to contact. In this document they will be referred to as data subjects (see Annex 1 definitions of data protection terms).

This policy explains how these data should be collected, stored and used in order to meet YT's data protection standards and comply with the new General Data Protection Regulation (GDPR), in effect from 25th May 2018.

This policy is reviewed annually by the YT Trustees and may be updated from time to time. The Trustees will continue to review the effectiveness of this policy to ensure it is achieving its objectives.

Why is this policy important?

This policy ensures that YT:

- protects the rights of our supporters, course participants , and other data subjects;
- complies with data protection law and follows good practice;
- protects all data subjects (defined in Annex 1) from the risks of a data breach.

ROLES AND RESPONSIBILITIES

Who and what does this policy apply to?

It applies to *all* those using/processing data on behalf of YT:

- the Chairman, the administrator, the book keeper;
- the Data Protection Manager;
- other Trustees and volunteers who have responsibility for health and safety, catering, organisation of musical events, fund raising.

It applies to all data that YT holds relating to data subjects, including:

- names
- email addresses
- postal addresses
- phone numbers
- course fees
- Gift Aid eligibility
- Gift Aid donations
- voice
- money paid to creditors – including fees
- willingness to be on our mailing list.

Roles and responsibilities

Everyone who has access to data as part of YT has a responsibility to ensure that they adhere to this policy. A table showing permitted data users and processors and the data they have access to is

shown in Annex 2.

Data Protection Manager

The Data Protection Manager for YT is Rodney Slatford. He, together with the Trustees, are responsible for deciding the reason why data should be collected and how they will be used. Any questions relating to the collection or use of data should be directed to the Data Protection Manager.

DATA PROTECTION PRINCIPLES

1. YT fairly and lawfully processes personal data

YT will only collect data where lawful and where it is necessary for the legitimate purposes of YT:

- The name, title, and contact details of volunteers (including host families), trustees, employees (permanent and temporary), course participants, hirers, visiting musicians, and contractors will be collected when they take up a position, and will be used to contact them regarding administration related to their role;
- An individual's name and contact details will be collected when they make a telephone or electronic booking for an event. This will be used to contact them about their booking and to allow them entry to the event;
- 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 YT to include them in a mailing list in order to communicate with them about events and activities;
- Data will not be stored on anyone under the age of 16.

2. YT only collects and uses personal data for specified and lawful purposes

When collecting data, YT will always explain to the data subject why the data is required and what it will be used for, e.g.

"I would like to be placed on the YT mailing list"

FCS will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, YT will never pass on personal data to third parties without the explicit consent of the data subject.

3. YT ensures any data collected is relevant and not excessive

YT will not collect or store more data than the minimum amount required for its intended purpose. For example, YT needs to collect telephone numbers from course participants in order to be able to contact them about administration, but data on their marital status or sexuality will *not* be collected, since it is unnecessary and excessive for the purposes of administration.

4. YT ensures data is accurate and up-to-date

YT will ask trustees, volunteers and staff to check and update their data each September. Course participants and visiting musicians will provide up-to-date information on registration. The supporters can unsubscribe from the database at any time. Any individual will be able to update their data at any point by contacting the Data Protection Manager.

5. YT ensures data is not kept longer than necessary

YT will keep data on data subjects for no longer than 12 months after their involvement with the organisation has ceased, unless there is a legal requirement to keep records (e.g. Gift Aid records have to be kept for six years after the end of the accounting period that includes the last donation to which they relate).

6. FCS processes data in accordance with individuals' rights

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

- Supporters, volunteers, host families, course participants, hirers and visiting musicians can request to see any data stored on them. Any such request will be actioned within fourteen 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 14 days of the request being made.
- Supporters can request to stop receiving any marketing communications. Any such request will be actioned within 14 days of the request being made.
- Supporters can object to any storage or use of their data that might cause them substantial distress or damage. Any such objection will be considered by the Committee, and a decision communicated within 30 days of the request.

7. YT keeps personal data secure

YT will ensure that data held by us are kept secure.

- Data users and data processors must ensure that any laptop or PC used is password protected and that any mobile electronic equipment such as laptops, tablets or iPads, and USB sticks are not left unattended in the presence of third parties.
- Physically-held data (e.g. on membership forms or email sign-up sheets) will be stored in a locked office.
- Access to data will only be given to Trustees, volunteers, the administrator and book keeper, where it is clearly necessary for the running of the group. The Data Protection Manager, together with the Trustees, will decide in what situations this is applicable and Data Protection Manager will keep a definitive list of who has access to which data.

8. Transfer to countries outside the EEA

YT does not transfer data to countries outside the European Economic Area (EEA).

DIRECT MARKETING

YT will collect data from consenting supporters for marketing purposes. This includes contacting them to promote concerts, updating them about group news, fundraising and other group activities.

Any time that data are collected for this purpose, we will provide:

- A clear and specific explanation of what the data will be used for (e.g. *If you would like to be placed on the YT mailing list, please complete the form below.*)
- A method for users to show their active consent to receive these communications (e.g. a 'tick box')

Data collected will only ever be used *in the way described and consented to*. The data will not be shared and never will be, with any third party.

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.

ACCEPTANCE OF THIS POLICY BY THE COMMITTEE

Signed:

(Chairman)

Date:

Next review date:

ANNEX 1

Definition of data protection terms

Data are all the information which is stored electronically, on a computer, or in certain paper-based filing systems.

Data subjects for the purpose of this policy include all individuals about whom we hold personal data. All data subjects have legal rights in relation to their personal data.

Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a name, address or date of birth) or they can be an opinion; YT only store factual data.

The Data Protection Manager is the person who, with the agreement of the Trustees, determines the purposes for which, and the manner in which, any personal data are processed. He or she has a responsibility to establish practices and policies in line with the GDPR.

Data users include all Trustees, the administrator, book keeper, volunteers with specific responsibilities eg health and safety and catering (food intolerances and allergies). Data users have a duty to protect the information they handle by following our data protection and security policies at all times.

Data processors include any person who processes personal data on behalf of YT.

Processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying them. Processing would also include transferring personal data to third parties.

Sensitive personal data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. The only sensitive personal data collected or used by YT relates to food intolerances and allergies.