



Grayshott Concerts – Data Protection Policy 2023

1. Introduction and scope

- 1.1 This is the Data Protection Policy of Grayshott Concerts CIO as approved by the Trustees of Grayshott Concerts on 14 December 2023.
- 1.2 Grayshott Concerts is committed to collecting, storing and using personal data in accordance with the General Data Protection Regulations (GDPR) and other relevant legislation. This policy applies to data relating to individuals held by Grayshott Concerts, including members (otherwise known as Friends of Grayshott Concerts), contractors, volunteers, musicians and artistes, donors, audiences and potential audiences.
- 1.3 This policy applies to all those handling personal data on behalf of Grayshott Concerts, including Trustees of Grayshott Concerts, volunteers, members and contractors.
- 1.4 This policy applies to all personal data that Grayshott Concerts holds relating to individuals, including names, email addresses, postal addresses, phone numbers, photographs, booking and financial information, dietary preferences and access requirements.
- 1.5 This policy uses three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office (ICO), the UK's independent body that upholds rights in personal data (www.ico.org.uk):
- 1.5.1 'Data controller': this is Grayshott Concerts. Grayshott Concerts determines why and how personal data is used, retained and destroyed as described in this policy.
 - 1.5.2 'Data processor': this is a person or organisation which processes personal data on behalf of Grayshott Concerts.
 - 1.5.3 'Data subject': this is the individual whose personal data is held by Grayshott Concerts.

2. Responsibilities

- 2.1 Overall and final responsibility for data protection sits with the Trustees.
- 2.2 Day to day responsibility for ensuring this policy is put into practice is delegated to one of the Trustees, currently the Artistic Director. After due consideration and in

accordance with ICO guidance, Grayshott Concerts has decided not appointed a Data Protection Officer.

2.3 In addition to the Artistic Director, there are various Data Processors who process personal data in order to carry out the following activities: (i) website maintenance and development (ii) bookings and seat allocation (iii) payments (iv) membership and other contacts (v) accounts and financial (vi) social media and marketing. Every Data Processor has a responsibility to ensure that they adhere to this policy.

2.4 The Artistic Director is responsible for ensuring that the Data Processors (including any contractors) perform their duties in line with this policy. Any questions relating to the collection or use of personal data should be directed to the Artistic Director at andy@grayshottconcerts.co.uk

3. Data Protection Principles

Grayshott Concerts will:

3.1 ***Fairly and lawfully process personal data in a transparent way.*** Grayshott Concerts will only collect data where it is lawful to do so and where it is necessary for the legitimate purposes of the organisation as set out below.

What this means:

3.1.1 A member's name and contact details will be collected when they first join the group, and will be used to contact the member regarding group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for membership fees and concert tickets

3.1.2 The name and contact details of volunteers and contractors will be collected when they take up a position, and will be used to contact them regarding administration related to their role. Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).

3.1.3 For ticket buyers who are not members, an individual's name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event.

3.1.4 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 Grayshott Concerts to communicate with them about and to promote its activities. See Section 6 'How we get consent' below.

3.1.5 An Individual's image and likeness may be captured in photographs for promotional purposes. Grayshott Concerts uses photographs for promotional

purposes on its website and social media accounts where it would not be necessary, appropriate or practicable to obtain specific consent from each individual featured (for example, we may seek specific consent for prominent or impactful uses, but typically not for group shots or background inclusion).

3.2 *Only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.*

What this means:

Grayshott Concerts will provide clear and specific information explaining to the Data subject why the data is required and what it will be used for. This policy gives that information.

3.3 *Ensure any personal data collected is relevant and not excessive.* Grayshott Concerts will not collect or store more personal data than the minimum information required for its intended purpose.

3.4 *Ensure personal data is accurate and up-to-date.* Grayshott Concerts will ask members to update their personal data annually on renewal of their membership. Any individual will be able to update their personal data at any point by contacting the Artistic Director at andy@grayshottconcerts.co.uk

3.5 *Ensure personal data is not kept longer than necessary.* Grayshott Concerts will keep personal data for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep it for longer). The storage and intended use of personal data will be reviewed in line with Grayshott Concerts data retention policy: see Section 8 'Data retention and disposal' below. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the personal data will be amended or deleted accordingly.

3.6 *Keep personal data secure.*

What this means:

3.6.1 Electronically-held personal data will be held within a password-protected and secure environment. Passwords will be re-set each time an individual with data access leaves their role/position.

3.6.2 Physically-held personal data (e.g. membership forms or email sign-up sheets) will be stored in a secure environment. Any physically-held personal data will be collected by the Artistic Director from any individual with access if they leave their role/position.

3.6.5 Access to personal data will only be given to trustees, Committee members, contractors or others where it is clearly necessary for the activities of Grayshott Concerts. The Artistic Director will decide in what situations this is applicable and will keep a master list of who has access to personal data.

3.7 Review and revise this policy as necessary at regular intervals but at least annually.

4. Individual Rights

4.1 When Grayshott Concerts collects, holds and uses an individual's personal data that individual has the following the rights over their data. Grayshott Concerts will ensure its data processes comply with those rights.

4.1.1 *Right to be informed*: whenever Grayshott Concerts collects personal data it will provide a clear and specific statement explaining why it is being collected and how it will be used: see Section 6 'How we get consent'.

4.1.2 *Right of access*: individuals can request to see the personal data Grayshott Concerts holds on them and confirmation of how it is being used. Requests should be made in writing to the Artistic Director at andy@grayshottconcerts.co.uk and will be complied with free of charge and within one month.

4.1.3 *Right to rectification*: individuals can request that their personal data be updated where it is inaccurate or incomplete. Any requests for data to be updated will be processed within two weeks.

4.1.4 *Right to object*: individuals can object to their personal data being used for a particular purpose by contacting the Artistic Director at andy@grayshottconcerts.co.uk Grayshott Concerts will provide a way for an individual to withdraw consent in all marketing communications. Where a request to stop using personal data is received Grayshott Concerts will comply unless it has a lawful reason to keep and use the data for its legitimate interests or to fulfil a contractual obligation.

4.1.5 *Right to erasure*: individuals can request that all personal data held on them by Grayshott Concerts is deleted by contacting the Artistic Director at andy@grayshottconcerts.co.uk If a request for deletion is made Grayshott Concerts will comply with the request unless there is a lawful reason to keep and use the data for its legitimate interests or to fulfil a contractual obligation, or there is a legal requirement to keep the data.

4.1.6 *Right to restrict processing*: individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data) by contacting the Artistic Director at andy@grayshottconcerts.co.uk Grayshott Concerts will restrict the personal data while it is verified.

4.2 Though unlikely to apply to the personal data processed by Grayshott Concerts, Grayshott Concerts will also ensure that rights related to portability and automated decision making (including profiling) are complied with where applicable.

5. Member to member contact

5.1 Grayshott Concerts will never sell personal data or allow third parties to use personal data for their own purposes. Grayshott Concerts will only use personal data to market third party products or services if explicit consent has been given by the individual concerned.

5.2 Grayshott Concerts will only share members' data with other members with the Data subject's prior consent.

5.3 As a membership organisation Grayshott Concerts encourages communication between members for social reasons. To facilitate this Members can request the personal contact details of other members by writing to the Artistic Director at andy@grayshottconcerts.co.uk The details will be released, as long as they are for the purposes of contacting the member concerned for social reasons and that member has explicitly consented to their data being shared in this way. Members may only request personal details for social reasons and not for any business or commercial purposes or for any other reason.

6. How we get consent

6.1 Grayshott Concerts only collects and retains personal data by requesting it and at the same time seeking permission to do so. At any time personal data is collected, Grayshott Concerts will provide:

6.2.1 A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')

6.2.2 A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Grayshott Concerts to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

6.2 Data collected will only ever be used in the way described and consented to.

6.3 Every marketing communication from Grayshott Concerts 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.

7. Web site and cookies

7.1 Grayshott Concerts uses cookies on its website. The data protection statement for the website is set out in the schedule to this policy.

8. Data retention and disposal

8.1 Grayshott Concerts is continuously reviewing the currency of its personal data. The personal data of members is subject to on-going review by the Data Processors in

carrying out the day to day activities of Grayshott Concerts. In the event of any issues or anomalies, checks and corrective action are performed promptly..

- 8.2 When a member leaves Grayshott Concerts and all administrative tasks relating to their membership have been completed, the contact details for that member will be deleted. Unless consent has been given their personal data will be removed from all email mailing lists.
- 8.3 When a volunteer or contractor stops working with Grayshott Concerts and all administrative tasks relating to their work have been completed, any potentially sensitive data relating to them will be deleted. Unless consent has been given personal data will be removed from all email mailing lists
- 8.4 Grayshott Concerts stores personal data in digital documents (e.g. spreadsheets) held on personal devices owned by the Artistic Director and Data Processors. Digital personal data is also stored by third party online services. Physical personal data is stored at the homes of the Artistic Director and Data Processors.
- 8.5 The Artistic Director and Data Processors are all aware of the need for up to date and adequate anti-virus and firewall protection. They also understand what they must and must not do to safeguard against cyber-attack, and that passwords must be strong and not written down or shared. The Artistic Director shall ensure that there are adequate data back-up and disaster recovery processes in place for each Data Processor.
- 8.6 Physical personal data will be destroyed safely and securely. Personal data stored digitally will be deleted and erased from all the devices on which it is stored. Priority will be given to any instances where personal data is stored in active lists (e.g. where it could be used) and to sensitive data.
- 8.7 Grayshott Concerts is permitted or required by statute to retain personal data for specific purposes. For example (i) Gift Aid declarations records (ii) details of payments made and received (e.g. bank statements and accounting records) (iii) minutes of Trustee meetings (iv) contracts and agreements with contractors and others (v) insurance details (vi) tax and employment records. Where deleting personal data would mean deleting other data that Grayshott Concerts has a valid lawful reason to keep then the relevant personal data may be retained safely and securely but not used.
- 8.7 The following criteria will be used to make a decision about what data to keep and what to delete:

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised	Anonymise data	Continue to use

Data Protection

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We will collect personal data on this website only if it is directly provided to us by you, the user, e.g. your name, email address and telephone number, and therefore has been provided by you with your consent. Normally you will only provide such details if you enquire with us using our contact form or make a purchase.

We also use analytical and statistical tools that monitor details of your visits to our website and the resources that you access, including, but not limited to traffic data, location data, weblogs and other communication data (but this data will not identify you personally).

The analytical data is obtained by placing Cookies on your viewing device. A Cookie is a small file of letters and numbers which we store in your browser or the hard drive of your computer (with your agreement). These Cookies may be necessary for the function of the website or they may be for website analytics or for marketing purposes.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this website. For all other types of cookies we need your permission.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

All our online payments for tickets and supper purchases are processed by Stripe. We do not have access to any of the credit card information or other financial details you enter when making a purchase, however we do receive a summary of the items you purchase so that we can complete the order. To view the Stripe privacy policy please visit <https://stripe.com/gb/privacy>

For additional general information, including how to control and disable cookies, please visit <https://cookiesandyou.com>

Last Reviewed: 5/2/2024

Next Review: 1/2/2025