

# Data Protection Policy

Linlithgow Reed Band (SC037031)

Last updated	October 2018
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## Definitions

<b>Charity</b>	means Linlithgow Reed Band, a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Jonathan Molloy, President, Linlithgow Reed Band
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

### 2. General provisions

- a. This policy applies to all personal data processed by the Charity.

- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least every two years.
- d. The Charity is not required to register with the Information Commissioner's Office as an organisation that processes personal data. This is because organisations or individuals who only process personal data for judicial functions, to maintain a public register or for domestic or recreational reasons are exempt.

### **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least every two years.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.
- d. The Register of Systems for the Charity comprises:
  - i. a single contact database of Charity members
  - ii. email data held in the LRB Secretary's email account
  - iii. a single contact database of Friends and Sponsors kept solely for the purpose of sending invitations to the Charity's concerts
  - iv. personal data added voluntarily by Charity members to the Muzodo app.
  - v. bank details held securely by the Charity's Treasurer on the Charity's online bank account to enable expenses payments to be made those Band members who have expressed a preference to receive money from the Charity in this way.
  - vi. a single contact database of Contacts from other organisations for arranging engagements and band activities such as hall lettings.

### **4. Lawful purposes**

- a. All data processed by the charity is done on the basis of legitimate interest.

### **5. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. The personal data held by the Charity will be kept to the minimum required for communication and contact purposes: name, email address, home address, mobile phone number, home phone number, instrument played, special dietary requirements. All such data will be held on a secure, shared platform accessible only to particular members of The Charity's general committee. Passport and date of birth data will only be collected prior to overseas trips and will not be retained after the trip has taken place.

### **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Members of the Charity will be asked to update their contact details periodically.

### **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall delete all personal data six months after members are deemed to have left the Charity. This will usually be defined as six months after a member stops paying a subscription.

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable. .

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY