



## Purbeck Youth Music Data Protection and Retention Policies

### Overview

- Purbeck Youth Music (PYM) is a Data Controller under the GDPR. The Data Protection Officer is the Chairman who can be contacted at [admin@purbeckyouthmusic.org](mailto:admin@purbeckyouthmusic.org)
- Policy approved by the PYM Trustees at their meeting on 8<sup>th</sup> September 2023:
- Next review date: in 24 Months

### Introduction

In order to operate, PYM needs to gather, store and use certain forms of information about individuals. These can include volunteers, teachers, pupils, audiences and potential audiences, business contacts and other people the charity has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet the PYM data protection standards and comply with the General Data Protection Regulations (GDPR).

This policy ensures that PYM:

- Protects the rights of our teachers, pupils, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect the charity from the risks of a data breach

### Roles and Responsibilities

This policy applies to all those handling data on behalf of the PYM e.g.:

- Trustees
- Teachers and volunteers
- Contractors/3rd-party suppliers

It applies to all data that the PYM holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial).

The Data Protection Officer for PYM shall be the Chair of Trustees. The Chair, together with the other Trustees, are responsible for the secure, fair and transparent collection and use of data by PYM. Any questions relating to the collection or use of data should be directed to the Data Protection Officer. Everyone who has access to data as part of PYM has a responsibility to ensure that they adhere to this policy.

PYM may use third party Data Processors (e.g. Mail Chimp) to process data on its behalf.

## Data Protection Principles

a) PYM will only collect data where lawful and where it is necessary for the legitimate purposes of the charity.

- A name and contact details will be collected when a teacher or pupil first has contact with the charity and will be used to contact that individual regarding administration, instrument loan and any other activities.

Other data may also subsequently be collected where lawful and necessary (eg. in order to process payment to the person or in order to carry out a DBS check). Where possible PYM will anonymise this data.

The collection and use of data will be fair and reasonable in relation to PYM completing tasks expected as part of its activities.

- 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 group administration related to their role.

- 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.

- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels.

b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

c) We ensure any data collected is relevant and not excessive, PYM will not collect or store more data than the minimum information required for its intended purpose.

d) We ensure data is accurate and up-to-date and may ask teachers, volunteers and contractors to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer.

e) We ensure data is not kept longer than necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records). When the intended use is no longer applicable the data will be deleted within a reasonable period.

f) We keep personal data secure

- Electronically held data will be held within a password-protected and secure environment

- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.

- Physically held data will be stored in a secure property.

- Access to data will only be given to relevant trustees/teachers/contractors where it is clearly necessary. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data.

When PYM collects, holds and uses an individual's personal data that individual has the following rights over that data. PYM will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

- Right to be informed: whenever PYM collects data it will provide a clear and

- specific privacy statement explaining why it is being collected and how it will be used.

- Right of access: individuals can request to see the data PYM holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months

- Right to rectification: individuals can request that their data be updated where it is inaccurate or incomplete. PYM may request that individuals check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.

- Right to object: individuals can object to their data being used for a particular purpose. the PYM will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- Right to erasure: individuals can request for all data held on them to be deleted. Our data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made, we will comply with the request unless: there is a lawful reason to keep and use the data for legitimate interests or contractual obligation or there is a legal requirement to keep the data.
- Right to restrict processing: individuals can request that their personal data be 'restricted– ' that is, retained and stored but not processed further.

We only share data with the subject's prior consent. Data collected will only ever be used in the way described and consented to.

### **Cookies on the PYM website**

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

PYM uses cookies on our website in order to monitor and record their activity. This allows us to improve users' experience of our website. We will implement a link that will activate each new time a user visits the website. By continuing to use our site the user agrees to our use of cookies.

It will also include a link to our Privacy Notice which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.

Policy adopted by the PYM Trustees at their meeting on 8<sup>th</sup> September 2023.

Signed:



Tim Arnold



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