



LHMF DATA PROTECTION POLICY

Introduction

The General Data Protection Regulations (commonly referred to as the GDPR) will replace the current Data Protection Act from 25 May 2018. The primary purpose of GDPR is to define standardised data protection laws for handling of personal data.

Personal data comprises any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This includes name, identification number, location data or online identifier.

Sensitive personal data is defined by the GDPR as data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. LHMF does not process any sensitive personal data.

Our data protection policy has been prepared based on the guidance on the Information Commissioner's Office (ICO) website and conversation with an ICO representative. It sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

The ICO Registration self-assessment questionnaire has been completed and there is no requirement to register with the ICO.

A Privacy Notice has been prepared and is found on the LHMF website at www.lhmf.org.uk/privacy_notice.

LHMF

The Leith Hill Musical Festival is a competitive choral festival for amateur choirs in the Surrey area and each year around two thousand singers take part.

Personal Data Held by LHMF

LHMF holds personal data in a number of categories as outlined below.

Mailing List

LHMF has a mailing list which contains email addresses of people who have signed up for information about the Festival. Subscription is only by signing up on the LHMF web site, www.lhmf.org.uk, and this can be anyone who has an interest in the Festival such as singers, potential audience members or any member of the general public.

The lawful basis for processing this data is considered to be "legitimate interest". This is based on the fact that the data is collected through individual subscription to the website.

The MailChimp email service is used to send out emails to all members of the mailing list. This includes news about concerts, rehearsals, fundraising activities and other information which may be of interest to those associated with the Festival.

Each email sent out provides the option to "unsubscribe".

Singers

The Honorary Secretary holds names and contact information for key contacts within each of the member choirs; these contacts are Chairman, Secretary, Conductor and LHMF Liaison (where appointed). This information is used to inform choirs of information relevant to the Festival including rehearsal arrangements and festival arrangements.

Each year junior choirs are invited to apply to take part in a Youth Choirs' Competition. Contact details for the conductors or teachers of these choirs are held by the Youth Day Coordinator. No information is held on the individual singers.

A number of Independent Singers take part in the March Concert. Contact details for these singers are held by the Honorary Secretary in order to send out information regarding rehearsals and concerts.

The lawful basis for processing this data is considered to be "legitimate interest". This is based on the fact that the people whose data is held provide the data voluntarily in order to receive information relating to the Festival.

Committee Members

The Honorary Secretary holds contact details (email addresses, postal addresses and phone numbers) for members of the Executive Committee and General Committee. This information is used to send out committee information such as dates of meetings, agendas and minutes.

Contact details of committee members may also be shared with other committee members to allow them to conduct Festival business.

The lawful basis for processing this data is considered to be "legitimate interest". This is based on the fact that the people whose data is held provide the information voluntarily in order to participate as committee members.

Contracted Personnel

The Festival appoints a number of adjudicators each year. Names, addresses, telephone numbers and email addresses are held by the Honorary Secretary in order to contact adjudicators about their contracts, the music and festival arrangements.

The Festival appoints one or more professional orchestras, a Festival Conductor, a number of soloists and two accompanists. Contact details of these musicians are held by the Honorary Secretary in order to appoint, contact and communicate with these musicians.

The lawful basis for processing this data is considered to be "contract". This is based on the fact that the individual, or group, has a contract with LHMF to provide services.

Friends and Patrons

LHMF has a number of Friends and Patrons who provide donations in order to receive information about the Festival and receive priority booking. Friends and Patrons provide contact details (name, address, email, telephone) and may pay by Banker's Order (all instructions are sent directly to their banks) or by cheque. This information is held by Friends and Patrons Secretary (not bank details) and a list of donors is also provided to the Assistant Treasurer who is responsible for reconciling the LHMF bank account. Also, information relating to Friends or Patrons who sign up for Gift Aid are held by the Assistant Treasurer responsible for Gift Aid (see below).

The lawful basis for processing this data is considered to be "legitimate interest". This is based on the fact that the people whose data is held provide the information voluntarily in order to support the Festival and receive the associated benefits.

Gift Aid

Choir members, Friends and Patrons and other donors may choose to complete a Gift Aid declaration in order to allow LHMF to reclaim tax on donations. This information comprises name, address, email address and amount donated, and is held by the Assistant Treasurer responsible for Gift Aid to allow the claim to be made.

The lawful basis for processing this data is considered to be “legitimate interest”. This is based on the fact that the people whose data is held provide the information voluntarily in order to support the Festival.

Audience Applications

LHMF runs a box office through which it sells a proportion of the Festival concert tickets. Applications for tickets are made on booking forms (including name, address, telephone number) which are sent to the person responsible for running the box office. These forms are retained until the Annual General Meeting, held in October, after which they are shredded.

The ticket booking form also provides a box for applicants to provide an email address if they wish to be added to the LHMF mailing list. This information is passed on the person responsible for managing the mailing list.

The lawful basis for processing this data is considered to be “legitimate interest”. This is based on the fact that the people whose data is held provide the information voluntarily in order to attend Festival concerts.

Audit

An initial audit will be conducted of all committee members and officers to ascertain the information that they hold and to make them aware of this policy.

Any data that is no longer required will be deleted.

Commitment

LHMF will not share any personal information relating to mailing list members, singers, friends or patrons with any outside agency or organisation.

Data relating to any individual will be removed from the relevant list(s) at their request at the earliest opportunity.

Data relating to any individual will be updated at their request.

Complaints

In the event of a complaint, the Honorary Secretary, who is the Data Controller, will look into the matter in the first instance, and it will be raised with the Executive Committee.