

## PRIVACY STATEMENT - membership and enquiries

### Personal data and privacy statement

We process personal data relating to members and their parents/carers, and to those who are interested in the services we provide.

We are committed to complying with our legal obligations in respect of data protection and privacy.

This statement sets out the principles we apply when processing personal data. This statement describes the types of personal data we may collect about you and/or your child. This statement also describes what we do with any data we collect about you and/or your child, how we will keep it secure and the legal bases on which we rely for processing your data. This statement also informs you of your rights and how you can contact us.

### 1. About us and our services

Our charity name is St. Paul's Youth Ensemble and our registered charity number is 1067834.

We provide music education services and live performances.

The charity is a Data Controller for the purposes of current data protection legislation.

Our contact details are:

St. Paul's Youth Ensemble  
stpaulsye@gmail.com  
spye.co.uk

### 2. What personal data do we collect from you?

Personal data is any information relating to an identifiable living individual. We only collect the personal data we need to be able to provide you with the services you have asked us to provide or tell you about.

**Personal/contact information:** this can include your name, contact address, email addresses, telephone numbers, your child's name and date of birth, your child's medical details

**Digital information:** Details of your interaction with our website and social media, should you engage with us through these channels.

**Correspondence:** information relevant to your specific enquiries.

**Other:** any other information you choose to provide to us.

### 3. When do we collect personal data?

We will collect information about you when you enter into a contract with us, make enquiries about our services, visit our website and engage with us on social media.

### 4. What is our lawful basis for processing your data?

We may only process personal data where we have a lawful basis to do so.

We may collect and process your personal data when:

- it is necessary for the **performance of contracts** with you;
- it is necessary for the purposes of our **legitimate interests** as a business. In these cases we will do so in a way which might reasonably be expected from our relationship with you, and which does not impact materially on your fundamental rights, freedom and interests. We will not process your personal data on this basis if we believe your rights override ours. Instead, we may seek your specific consent, and/or another legal basis;
- it is necessary for compliance with **legal obligations**;
- we have your **consent** to do so, for example in relation to marketing by electronic means.

Please see below for more detailed information about how we will use your data and on what basis.  
If you have any concerns about our data processing please contact us: see **Contact**. Please also see **Your rights**, below.

## 5. How will we use your personal data?

We may process the information we collect about you:

- to perform any contract we have agreed with you, or to respond to any enquiries you make in this connection before we enter into a contract. The lawful basis for this processing is performance of a contract with you or because you have asked us to take specific steps before entering into a contract in respect of these activities and services;
- to respond to any other enquiries or complaints. We need the information you supply to enable us to respond.
- to protect our business from fraud and other illegal activities. This processing is necessary for our legitimate interests by ensuring the proper management of our business and financial risks.
- We will only send marketing information to you by email if we have your consent. You have the right to withdraw your consent at any time. Please write, email or telephone us: see **Contact** below.
- to send you communications required by law or which are necessary to inform you about changes to the services we provide you, for example, updates to this Privacy Statement, and any information legally required which relates to any contracts between us. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. This processing is necessary for us to comply with our legal obligations.

## 6. Who do we share your data with?

In some circumstances we may need to share your data with the following:

- Our committee members

In some circumstances, we may need to share your personal data with other third parties (including legal or other advisers, regulatory authorities, courts and government agencies) to enable us to enforce our legal rights, or where such disclosure may be permitted or required by law.  
Unless we tell you otherwise, your data will not be processed outside the EEA.

## 7. How long will we keep your data?

We will only keep personal data for as long as is necessary to provide our services, or for as long as we reasonably need to keep the information for the lawful business purposes or to comply with a statutory or other legal requirement.

Categories of individuals	Personal data items	Retention period and reason
Members and parents/carers	Name Address Email Mobile phone number	1 year post-contract termination to ensure right to pursue fee recovery
Members and parents/carers	Medical details of member	Deleted upon termination of membership
Members and parents/carers	Date of birth	Deleted upon termination of membership
Enquirers re. joining	Name, email, telephone number	1 year post contract if applicable; 1 year after initial contact
Newsletter email subscribers Past and departing members	Name & email address	Until consent withdrawn or until we refresh consent according to ICO guidelines

## 8. Data security

We will take appropriate technical and organisational measures to protect the personal data we transmit, store or otherwise process against accidental or unlawful destruction, loss, alteration or unauthorised disclosure or access. Our computers and mobile devices are password protected. Paper documents are kept in locked storage, and digital forms are retained in cloud storage.

## 9. Your rights

You may exercise your rights by contacting us using the details in Contact, below. We aim to handle any requests within a reasonable period and, in any event, within one calendar month of the original request.

- **Right to information and access**

You have the right to be informed about what personal data we collect about you, why, on what lawful basis and what your rights are. This Privacy Statement is the key document we use to inform you about this.

You also have a right to request access to the information that we hold about you, and to receive a copy of this information, along with other information which is generally contained in this Privacy Statement.

- **Right to rectification**

- You have the right to request that inaccurate personal data be rectified, or completed if it is incomplete.
- **Right to erasure and restriction**  
You have the right to ask us to limit or cease processing or erase information we hold about you in certain circumstances. When responding to such requests, we will tell you how such restrictions or deletions may affect our ability to fulfil our contracts with you or otherwise affect your interests.
  - **Right to object**  
You have the right to object to our using your information for direct marketing. You can also ask us to stop using your information, where we are processing it on the basis of our legitimate interest. We will do so unless we believe we have a legitimate overriding justification to continue processing your personal data.
  - **Right to withdraw consent**  
If you have given us any specific consent to use your personal data, you have the right to withdraw it any time. If you wish to tell us that you are withdrawing your consent, please email us at [stpaulsye@gmail.com](mailto:stpaulsye@gmail.com).

### **10. Complaints**

If you are unhappy with the way we process your personal data, please contact us using the information provided below. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113 or 01625 545 745

<https://ico.org.uk/global/contact-us/>

### **11. Contact**

If you have any questions about this policy, or you wish to exercise any of your rights, please email us at [stpaulsye@gmail.com](mailto:stpaulsye@gmail.com).

### **12. Updates to this statement**

We may change this privacy statement from time to time. We will post updates to this privacy statement on our website, and where appropriate, we may notify you by post or email. Please check our website to stay up to date.

Last updated: September 2019