

AMADEUS CHAMBER ORCHESTRA

Registered Charity No. 1098000

General Data Protection Regulation privacy policy

1. Introduction

Amadeus Chamber Orchestra ('the Orchestra') is committed to protecting the privacy and personal information of our orchestra members, guest musicians, volunteers, contractors and audiences. This privacy policy is about

- the information that we hold from which individuals can be identified ('Personal Data');
- how we deal with Personal Data; and
- who we may share it with.

This privacy policy also provides information on your legal rights in relation to your Personal Data.

It was approved by the Trustees of the Orchestra on 10 September 2018.

2. Changes to this Privacy Policy

From time to time we may change the way we use your Personal Data and amend this privacy policy. The current version of our privacy policy will be displayed on our website and can be requested by e-mailing:

amadeus.gdpr@gmail.com

If the changes are particularly significant, we would seek to draw your attention to them through e-mails and/or other means.

3. What Personal Data do we collect and use?

The Personal Data about you that we collect and use is principally:

- your name;
- your contact details including e-mail address, telephone number and, in some cases, postal address; and
- in the case of orchestra members and guest musicians, details of instrument played (in addition to the above information).

In some cases, it may include other Personal Data that you may provide to us from time to time.

4. How your Personal Data is collected

We collect Personal Data about you:

- in the case of orchestra members, guest musicians, volunteers and contractors, from information given to us by you or given to us by an existing orchestra member, guest musician, volunteer or contractor who has recommended that the Orchestra invite you to participate in a concert;
- in the case of audience members or potential audience members, from information given to us by you when applying to join our publicity mailing list or from information obtained from online ticket purchases where you have given consent for us to collect that information; and

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- from any information you supply to us as to change of address or as to e-mail address.

If you decide to supply Personal Data to us about another person, please ensure that you do so only with that person's approval.

5. What we use your Personal Data for

We may use your Personal Data for one or more of the following purposes:

- in the case of orchestra members, guest musicians, volunteers and contractors, for communicating about rehearsal and concert arrangements and other matters relating to the Orchestra; and
- sending communications about future concerts and activities of the Orchestra to the Orchestra's publicity mailing list and to individuals who have consented to receiving such information from the Orchestra.

Other than as above, we would not expect to make any use of your Personal Data.

6. Your rights in relation to your Personal Data

You can tell us that you no longer wish to receive communications from us either of a particular kind or at all by sending an e-mail to that effect to:

amadeus.gdpr@gmail.com]

7. The lawful grounds on which we collect and process your Personal Data

We process your Personal Data for the above purposes relying on one or both of the following lawful grounds:

- in the case of orchestra members, guest musicians, volunteers or contractors, that we have a legitimate interest in holding limited Personal Data in order to complete the tasks that those persons expect us to perform in connection with the Orchestra's activities;
- in the case of audience members or potential audience members, that by expressly asking to join the Orchestra's publicity mailing list or by ticking the box to consent to the Orchestra sending information about its future concerts, you have given your express consent to us holding limited Personal Data.

8. Our legal obligations regarding your data

We collect and process your Personal Data in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ('**GDPR**') and the UK Data Protection Act 2018 ('**DPA**') together with other applicable UK and EU laws that regulate the collection, processing and privacy of your Personal Data (together, '**Data Protection Law**').

9. Disclosing your Personal Data to third parties

We will treat your Personal Data as private and will not disclose your Personal Data to third parties without you knowing about it. The only exceptions would be where we use third party data

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processors such as TicketSource who are engaged under contract to handle data on our behalf to assist in carrying out our activities as an orchestra. In relation to these data processors, we will take all reasonable steps to ensure that they

- act only in accordance with our instructions;
- only use your Personal Data for lawful purposes and in compliance with applicable data protection law; and
- put adequate safeguards in place to protect your Personal Data.

10. How long we retain your Personal Data for

We will not retain your Personal Data for any longer than necessary for the purpose for which it was collected. The length of time over which data will be retained will depend upon the circumstances including the reasons why the Personal Data were obtained and why it is held.

In the case of orchestra members, guest musicians, volunteers and contractors we would not ordinarily expect to retain your Personal Data for longer than 5 years after the date of the last concert in which you participated or worked with the Orchestra (unless we obtain your consent to retain your Personal Data for a longer period).

Certain Personal Data must be held for particular periods to comply with applicable legal obligations.

We shall take all reasonable steps to ensure that we dispose securely of Personal Data that we decide no longer to retain.

11. Security that we use to protect Personal Data

We employ appropriate technical and organisational security measures to protect your Personal Data from being accessed by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

We also endeavour to take all reasonable steps to protect Personal Data from external threats such as malicious software or hacking. However, please be aware that there are always inherent risks in sending information by public networks or using public computers and so we cannot guarantee the security of all data sent to us (including Personal Data).

12. Your Personal Data rights

You have a statutory right (**'Subject Access Request'**) to request information, including information about:

- the Personal Data that we hold about you;
- what we use that Personal Data for; and
- to whom it may be disclosed.

Usually we will have a month to respond to such as Subject Access Request. We reserve the right to verify your identity if you make such a Subject Access Request and we may, in case of complex requests, require a further two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests for information. We may also rely upon certain legal exemptions when responding to your request.

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You also have the following statutory rights, which are exercisable by making a request to us in writing:

- to require that we correct Personal Data that we hold about you which is inaccurate or incomplete;
- to require that we erase your Personal Data without undue delay, if we no longer need to hold or process it;
- to object to our use of your Personal Data for direct marketing; or
- to require that we do not use of your Personal Data otherwise than in compliance with the policy statements above unless we have a legitimate reason for so using it.

All of these requests may be forwarded on to a third party provider who is involved in the processing of your Personal Data on our behalf.

If you would like to exercise any of the rights set out above, please contact us at the address below.

If you make a request and are not satisfied with our response, or believe that we are illegally processing your Personal Data, you have the right to complain to the Information Commissioner's Office (ICO) – see <https://ico.org.uk>.

13. Contact details

If you have any queries regarding this Privacy Policy or wish to make a further request relating to how we use your Personal Data as described above, please contact:

amadeus.gdpr@gmail.com

September 2018