

# Ladies of Note

## Data Protection policy

### Key details

- Policy prepared by Sandra Lumb and Kate Thompson
- Next review date: 31/05/2019

### Introduction

In order to operate, Ladies of Note needs to gather, store and use certain forms of information about individuals.

These can include members, and other people the group 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 Ladies of Note data protection standards and comply with the General Data Protection Regulations (GDPR).

### Why is this policy important?

This policy ensures that Ladies of Note

- Protects the rights of our members and supporters
- Complies with data protection law and follows good practice
- Protect the group from the risks of a data breach

### Who and what does this policy apply to?

This applies to *all* those handling data on behalf of Ladies of Note e.g.:

- Leader , Treasurer, Social Secretary and Librarian
- Members

It applies to all data that Ladies of Note holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Emergency contact details
- Photographs /Videos

## Roles and responsibilities

The Leader and Treasurer are the Data Controllers and will determine what data is collected and how it is used. The Data Protection Officer for Ladies of Note is **Christine Bartlett**. They are responsible for the secure, fair and transparent collection and use of data. 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 Ladies of Note has a responsibility to ensure that they adhere to this policy.

(Ladies of Note does not use third party Data Processors (e.g. [Mail Chimp]) to process data on its behalf.)

### a) We fairly and lawfully process personal data in a transparent way

Ladies of Note will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name and email address will be collected when they first join the group, and will be used to contact the member regarding group membership administration and activities. Other data will also subsequently be collected in relation to their membership, including their address, telephone number, Emergency contact details and any other relevant information re :emergency contact as each member feels is necessary.
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Ladies of Note completing tasks expected as part of the individual's membership).
- 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.
  - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Ladies of Note completing tasks expected as part of the booking),

(Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual can be collected via tracking 'cookies')

– N.B. Ladies of Note website does not use Cookies.

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

When collecting data, Ladies of Note will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

### c) We ensure any data collected is relevant and not excessive

Ladies of Note will not collect or store more data than the minimum information required for its intended purpose.

E.g. we need to collect telephone numbers and email addresses from members in order to be able to contact them about group administration and Emergency contact details are collected in case of illness/emergency arising during rehearsals or concerts but data on their marital status or sexuality for

example will not be collected, since it is unnecessary and excessive for the purposes of group administration.

**d) We ensure data is accurate and up-to-date**

Ladies of Note will ask members 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**

Ladies of Note will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).

The storage and intended use of data will be reviewed in line with Ladies of Note data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

**f) We keep personal data secure**

Ladies of Note will ensure that data held by us is kept secure.

- Electronically-held data will be held within password-protected and secure environment (active anti-virus and updated Firewall on Personal Computers used by Leader, Treasurer, Librarian and Social secretary)
- Physically-held data (e.g. Contact detail forms and Consent forms) will be stored in a locked cupboard/case.
- Keys for locks securing physical data files should be kept by the Data Protection Officer
- Access to data will only be given to the Leader, Treasurer, Librarian and Social secretary where it is clearly necessary for the running of the group. The Data Protection Officer will keep a master list of who has access to data

**g) Transfer to countries outside the EEA**

Ladies of Note will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.



When Ladies of Note collects, holds and uses an individual's personal data that individual has the following the rights over that data. Ladies of Note 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.

**Individual's rights**

- *Right to be informed:* whenever Ladies of Note 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 Ladies of Note 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 Ladies of Note will request that members 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 Ladies of Note 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. Ladies of Note 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.
  - There is a legal requirement to keep the data.



We only share members' data with other members with the subject's prior consent

As a membership organisation Ladies of Note encourages communication between members. (e.g. Offer lifts to rehearsals, send cards/letters etc.)

To facilitate this:

- Members can access the personal contact data (email, address and telephone number) of other members as long as the subject has consented to their data being shared with other members in this way



Ladies of Note will collect contact details from members upon joining and will obtain active consent for use of these details by the use of a 'tick box' with a clear and specific explanation of what the data will be used for.

(NB we do not use email data in order to market 3rd-party products and we do not send out Marketing communications)



**Cookies are not used on the Ladies of Note Website**

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# Ladies of Note

## Data retention policy

### Introduction

This policy sets out how Ladies of Note will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of Ladies of Note Data Protection Policy.

### Roles and responsibilities

Leader and Treasurer are the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for Ladies of Note is **Christine Bartlett**. They and the Librarian and Social Secretary are responsible for the secure and fair retention and use of data by Ladies of Note. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

A regular review of all data will take place to establish if Ladies of Note] still has good reason to keep and use the data held at the time of the review.

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review will take place on 31.05.2020

### Data to be reviewed

- Ladies of Note stores data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- Physical data stored at the homes of the aforementioned Officers

### Who the review will be conducted by

The review will be conducted by the Data Protection Officer with the Leader and Treasurer to be decided on at the time of the review.

### How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
  - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
  - Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

## Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised	Anonymise data	Continue to use

## Statutory Requirements

Date stored by Ladies of Note may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments made and received (e.g. in bank statements and accounting records)
- General meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details

## **Member data**

- When a member leaves Ladies of Note and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

## **Other data**

- All other data will be included in a regular two year review.