



## **Data Protection Policy**

### **1. Personal data**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the 'GDPR').

### **2. Data Controller**

The committee of Wimbledon Community Chorus ( WCC) is the data controller for WCC. This means committee members decide how your personal data is processed and for what purposes. A minimal number of designated Choir Representatives have access to and use your personal data for these purposes.

### **3. How do we process your personal data?**

The Choir Representatives of Wimbledon Community Chorus comply with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use personal data for the following purposes:

- to administer membership records

- to maintain our financial accounts and records

- to provide news and information about events, activities and performances

- to enable the choir to provide a service for the benefit of the public in our local community

- to provide contact details of officers and others with specific responsibilities

### **4. What is the legal basis for processing your personal data?**

Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -

- the processing relates only to members or former members (or those who have regular contact with it in connection with those

purposes); and  
there is no disclosure to a third party without consent; or

Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement; or

Explicit consent of the data subject has been given.

## 5. Sharing personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the choir or committee in order to carry out a service for yourself or for purposes connected with the association. We will only share your data with third parties with your explicit consent.

## 6. How long do we keep data? We retain data on the following basis:

Record Type	Retention Period
Membership Rolls	Indefinitely
Members' Contact Details	Two years after the last contact unless specifically requested otherwise.
Photographs/Videos of events	Selected items retained for historical records
Safeguarding matters	Indefinitely or until otherwise advised by authorities
Complaints (non- safeguarding)	Three years after resolution of complaint (unless further action is anticipated)
Minutes	Indefinitely
Bank and Gift Aid Details	Seven years to comply with statutory requirements

## 7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

The right to request a copy of the personal data which WCC holds about you (a Subject Access Request or 'SAR').

The right to request that the Committee of WCC corrects any personal data if it is found to be inaccurate or out of date.

The right to request that your personal data is erased where it is no longer necessary for WCC to retain such data.

The right to withdraw your consent to the processing at any time.

The right to request that the data controller provide you with your personal data and where possible, to transmit that data directly to another data controller.

The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.

The right to object to the processing of personal data.

The right to lodge a complaint with the Information Commissioners Office.

## 8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## 9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Chair of Wimbledon Community Chorus in person or by email. You can contact the Information Commissioners Office:

Telephone: 0303 123 1113: email <https://ico.org.uk/global/contact-us/email/>  
The Information Commissioner's Office,  
Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Agreed by the Committee of Wimbledon Community Chorus

Last reviewed: June 2024. To be reviewed annually.