



**Data Protection  
&  
Data Retention Policy**

Version 1.0  
Adopted on 17th October 2018



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## **Data Protection Policy**

### **Introduction**

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

These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the organisation has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used by Comber Brass in order to meet data protection standards and comply with the General Data Protection Regulations (GDPR).

This policy ensures that Comber Brass:

- Protects the rights of our members, volunteers and supporters;
- Complies with data protection law and follows good practice;
- Protects the organisation from the risks of a data breach.

### **Roles and Responsibilities**

This policy applies to *all* those handling data on behalf of Comber Brass e.g.:

- Committee members
- Employees and volunteers
- Members
- Contractors / 3<sup>rd</sup> party suppliers

It applies to all data that Comber Brass holds relating to individuals, including:

- Names
- E-mail addresses
- Postal addresses
- Telephone and mobile phone numbers
- Any other personal information held (e.g. financial)

Comber Brass is the Data Controller and will determine what data is collected and how it is used. A member of the organisation is appointed as the Data Protection Officer for Comber Brass who, together with the committee, is responsible for the secure, fair and transparent collection and use of data by Comber Brass. Any questions relating to the collection or use of data should be directed to the Data Protection Officer in the first instance.

Everyone who has access to data as part of Comber Brass has a responsibility to ensure that they adhere to this policy.

If Comber Brass uses third party Data Processors to process data on its behalf, it will ensure all such Data Processors are compliant with GDPR.

### **Data Protection Principles**

#### **[a] We fairly and lawfully process personal data in a transparent way.**

Comber Brass will only collect data where lawful and where it is necessary for the legitimate purposes of the organisation.

A member's name and contact details will be collected when they first join the organisation, and will be used to contact the member regarding organisation administration and activities. Other data may also subsequently be collected in relation to their membership, including their subscription payment history. Where possible Comber Brass will anonymise this data.



- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Comber Brass completing tasks expected as part of the individual's membership).

The name and contact details of volunteers, employees and contractors will be collected when they take up a position, and will be used to contact them regarding organisation administration related to their role. Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Comber Brass completing tasks expected as part of working with the individuals)

An individual's name and contact details will be collected when they make a booking for an event or when arranging an engagement. This will be used to contact them about their engagement or 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 Comber Brass completing tasks expected as part of the booking)

An individual's name, contact details and other details may be collected at any time (including when booking tickets or at an event) with their consent, in order for Comber Brass to communicate with them about and promote organisation activities. See 'How we get consent' below.

- Lawful basis for processing this data: Consent (see 'How we get consent')

Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the Comber Brass website' below.

- Lawful basis for processing this data: Consent (see 'How we get consent')

**[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, Comber Brass 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.**

Comber Brass will not collect or store more data than the minimum information required for its intended purpose. E.g. we need to collect telephone numbers from members in order to be able to contact them about organisation administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of organisation administration.

**[d] We ensure data is accurate and up-to-date.**

Comber Brass will ask members, volunteers and staff 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.**

Comber Brass 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 our data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the organisation) the data will be deleted within a reasonable period.

**[f] We keep personal data secure.**

Comber Brass will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment.



- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- Physically-held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard.
- Keys for locks securing physical data files should be collected by the Data Protection Officer from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position.
- Access to data will only be given to relevant trustees/committee members/contractors where it is clearly necessary for the running of the organisation. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data.

#### **[g] Transfer to countries outside the EEA.**

Comber Brass 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.

#### **Individual Rights**

When Comber Brass collects, holds and uses an individual's personal data that individual has the following the rights over that data. Comber Brass 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 Comber Brass 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 Comber Brass 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. Comber Brass will request that members, staff and contractors 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. Comber Brass 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. Comber Brass 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.
- *Right to restrict processing:* individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, Comber Brass will restrict the data while it is verified).

Though unlikely to apply to the data processed by Comber Brass, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

#### **Member to Member Contact**

We only share members' data with other members with the subject's prior consent. As a membership organisation Comber Brass encourages communication between members.

To facilitate this, members can request the personal contact data of other members in writing via the Data Protection Officer or the Secretary. These details will be given, as long as they are for the



purposes of contacting the subject (e.g. an email address, not financial or health data) and the subject has consented to their data being shared with other members in this way.

### **How we get consent**

Comber Brass may collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about organisation news, fundraising and other organisation activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like Comber Brass to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

Data collected will only ever be used in the way described and consented to (e.g. we will not use e-mail data in order to market 3<sup>rd</sup> party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

### **Cookies on the Comber Brass web-site**

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

Comber Brass may use cookies on our website [www.comberbrass.co.uk](http://www.comberbrass.co.uk) in order to monitor and record their activity. This would allow us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

If we use cookies, we will implement a pop-up box on [www.comberbrass.co.uk](http://www.comberbrass.co.uk) that will activate each new time a user visits the website. This will allow them to click to consent (or not) to continuing with cookies enabled, or to ignore the message and continue browsing (i.e. give their implied consent). It will also include a link to our Privacy Policy which outlines which specific cookies are used and how cookies can be disabled in the most common browsers.



## Data Retention Policy

### **Introduction**

This policy sets out how Comber Brass will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of Comber Brass Data Protection Policy.

### **Roles and responsibilities**

Comber Brass is the Data Controller and will determine what data is collected, retained and how it is used. A member of the organisation is appointed as the Data Protection Officer for Comber Brass who, together with the committee, is responsible for the secure and fair retention and use of data by Comber Brass. Any questions relating to data retention or use of data should be directed to the Data Protection Officer in the first instance.

### **Regular Data Review**

A regular review of all data will take place to establish if Comber Brass 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 be undertaken in January 2019.

### **Data to be reviewed**

- Data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
- Data that may be stored on third party online services (e.g. Google Drive, Mail Chimp)
- Physical data stored at the homes of committee members.

### **Who the review will be conducted by**

The review will be conducted by the Data Protection Officer with other committee members 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.

<u>Question</u>	<u>Yes</u>	<u>No</u>
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.



<b><u>Question</u></b>	<b><u>Yes</u></b>	<b><u>No</u></b>
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**

Data stored by Comber Brass may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Gift Aid declaration records;
- Details of payments made and received (e.g. in bank statements and accounting records);
- Trustee meeting minutes;
- Contracts and agreements with suppliers/customers;
- Insurance details;
- Tax and employment records.

### **Other data retention procedures**

#### **[a] Member data**

When a member leaves Comber Brass 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.

#### **[b] Mailing list data**

If an individual opts out of a mailing list their data will be removed as soon as is practically possible.

- All other data will be stored safely and securely and reviewed as part of the next two year review.

#### **[c] Volunteer and freelancer data**

When a volunteer or freelancer stops working with Comber Brass and all administrative tasks relating to their work 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.

#### **[d] Other data**

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



## **Comber Brass - Privacy Notice**

### **What is this guide for?**

Whenever we need to collect any of your data, we will let you at that point *why* we need to do so and *what* it will be used for, but this guide provides a useful overview of all of those situations and provides more detail on how we keep your data secure and up to date, how long we might hold it for, and what your rights are in relation to it.

Comber Brass is committed to protecting your personal data and will use any personal or sensitive data we collect from you in line with the General Data Protection Regulations (GDPR).

### **Who's responsible for data the organisation collects?**

Comber Brass is a Data Controller under the GDPR. Comber Brass has a Data Protection Officer who can be contacted at [info@comberbrass.co.uk](mailto:info@comberbrass.co.uk).

### **What data do we collect and what do we use it for?**

Comber Brass collects data from individuals to help us plan, organise and run the day-to-day operations of the organisation (e.g. co-ordinating rehearsals or collecting subscription payments) and to promote and market the organisation's activities (e.g. marketing mailing lists and photography/video capture).

#### **[a] Members: for administering membership**

When you join Comber Brass as a member or during your membership with us, we may need to collect some of the following information on you:

- Name
- Email address
- Phone / mobile number
- Address
- Emergency contact details
- Medical information
- Gift Aid Declarations
- Age/gender
- DBS checks
- Bank details
- Photos/video footage
- Audition notes

This data will be used by committee members to manage your membership with Comber Brass and to organise and run our activities.

If you give us your consent to do so, we may also use your contact details to send you marketing/promotional communications from the organisation. Any marketing/promotional communication we send you will include a clear option to withdraw your consent (e.g. to 'opt out' of future emails) and you can also withdraw consent at any point by contacting the Data Protection Officer.

#### **[b] Contractors for services: for arranging engagements and hiring at events**

Where you wish to engage or hire the organisation to provide music services, we need to collect data (such as contact information) to arrange this. This data will only be used for administering the services requested and for managing and organising their delivery at the event. This data will not be used to send you marketing/promotional messages from the organisation in the future, unless you have also provided your consent to receive these (see below).

#### **[c] Event attendees: for processing and managing tickets for events**

Where our events are ticketed, we need to collect data on the person booking (name and email) in order to allow you access to the event and to send you a confirmation of your reservation/purchase. This data will only be used for administering your access to the event/s for which you have booked and will *not* be used to send you marketing/promotional messages from the organisation in the future, unless you have also provided your consent to receive these (see below).



**[d] Employees & contractors: for administration & legal / regulatory purposes**

We may need (for administration or for legal/regulatory reasons) to collect personal or sensitive data on employees or contractors of the organisation. Where this is the case, we will explain what this is for at the point of collection.

**[e] Mailing list subscribers: for marketing and promotion**

We may offer the opportunity to sign up (consent) to receive marketing and promotional information on the organisation's activities (e.g. emails about forthcoming events).

When you sign-up to our marketing mailing list we may ask for your name, email, phone number, address and will use this data to send you information about our events and activities (e.g. forthcoming performances, social events and fundraising events). We may also ask for your preferred topics and communication methods. These allow us to tailor the information we provide to suit your preferences (e.g. email vs post).

We will *only* send you information that is related to the organisation (e.g. we will *not* use your data to send you marketing messages from 3<sup>rd</sup> parties).

Anything we send you will include a clear option to withdraw your consent (e.g. to 'opt out' of future emails) and you can also do so at any time by contacting the Data Protection Officer.

**[f] Website visitors: for running and improving our website**

We may use cookie technology when a person visits our website to collect and analyse *anonymised* data on how many people have visited, what pages they have looked at and other statistical information. We may also use cookies to allow members to log in and out in order to view our members-only section.

We will use a pop-up banner to let users know if we are using cookies on their first visit, and they can at any time disable cookies in their browser if they do not wish their (anonymised) data to be tracked.

You can find out more about cookies at <http://www.allaboutcookies.org/>.

**Do we share your data with anyone else?**

We will never pass your details on to third parties for marketing purposes.

If we use third party services to process your data (e.g. Google Drive) we will always ensure they are reputable, secure, and process your data in accordance with your rights under GDPR.

**Are there special measures for children's data?**

Where we knowingly collect or store data of children under 13 we will ensure the person with parental responsibility for the child has seen the relevant information relating to the child data or has given consent on behalf of the child.

Once a child is over 13 years old, parental consent to use their data will no longer be sufficient. We will only continue to hold/use the data if the child *themselves* also gives their consent.

**How can you update your data?**

You can contact us at any time at [info@comberbrass.co.uk](mailto:info@comberbrass.co.uk) to update or correct the data we hold on you.

**How long we will hold your data?**

The Comber Brass data retention policy is to review all data held on individuals at least every two years and remove data where we no longer have a legitimate reason to keep it.

Where you have withdrawn your consent for us to use your data for a particular purpose (e.g. unsubscribed from a mailing list) we may retain some of your data for up to two years in order to preserve a record of your consent having been withdrawn.



### **What rights do you have?**

Under the GDPR, you have the following rights over your data and its use:

- The right to be informed about what data we are collecting on you and how we will use it.
- The right of access - you can ask to see the data we hold on you.
- The right to rectification - you can ask that we update or correct your data.
- The right to object - you can ask that we stop using your data for a particular purpose.
- The right to erasure - you can ask us to delete the data we hold on you.
- The right to restrict processing - you can ask that we temporarily stop using your data while the reason for its use or its accuracy are investigated.

Though unlikely to apply to the data we hold and process on you, you also have rights related to portability and automated decision making (including profiling).

All requests related to your rights should be made to the Data Protection Officer at [info@comberbrass.co.uk](mailto:info@comberbrass.co.uk). We will respond within one month.

You can find out more about your rights on the Information Commission's Office website

### **What will we do if anything changes?**

If we make changes to our privacy statements or processes we will post the changes here. Where the changes are significant, we may also choose to email individuals affected with the new details. Where required by law, will we ask for your consent to continue processing your data after these changes are made.

## **Use of Cookies**

### **What are 'cookies'?**

'Cookies' are small text files that are stored by the browser (for example, Internet Explorer) on your computer or electronic device. They allow websites to 'remember' you for a period of time so that they can store things like user preferences and make the website quicker and easier for you to use. Without cookies, some things on websites would not be able to work: for example, without cookies it might not be possible to know whether or not you are logged in on a website, which would prevent you from being able to see content restricted to logged-in users.

### **How does the Comber Brass website use cookies?**

A visit to a page on the Comber Brass website may create the following types of cookie:

- Registration and preferences cookies
- Anonymous analytics cookies

#### **[a] Registration and preferences cookies**

When you register with Comber Brass, we may generate cookies that let us know whether you are signed in or not. Our servers use these cookies to work out which account you are signed in with, and if you are allowed access to a particular service. It also allows us to associate any comments you post with your username. If you have not selected 'keep me signed in', your cookies get deleted when you either close your browser or shut down your computer.

#### **[b] Anonymous analytics cookies**

Every time someone visits our website, software provided by other organisations (Google Analytics, Wordpress) generates an 'anonymous analytics cookie'.

These cookies can tell us whether or not you have visited the site before and what pages you visit. Your browser will tell us if you have these cookies and, if you don't, we generate new ones. This allows us to track how many individual users we have, and how often they visit the site. We use them to gather statistics, for example, the number of visits to a page, to help us identify if visitors would benefit from more information on a particular area.



### **How do I turn cookies off?**

It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies from a particular website. All modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser. To understand these settings, the following links may be helpful, or you can use the 'Help' option in your browser for more details.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)

Please note: switching off cookies may prevent some aspects of our website from working fully (e.g. you may not be able to access our members-only).

### **Useful links**

You can find out more about cookies and their use on the internet from [www.allaboutcookies.org](http://www.allaboutcookies.org)



## **Comber Brass Privacy Statement (existing members)**

To comply with the new General Data Protection Regulations 2018, this notice is to advise members of the band about personal data that Comber Brass collects, why it is collected and what it is used for.

### **Why does Comber Brass need personal data?**

Comber Brass will collect and store some personal data e.g. your name and email address, in order that it can keep its members informed about rehearsals and engagements, and for other band related activities and administration.

### **What data does Comber Brass collect from its members?**

Comber Brass may need to collect *some* of the following types of data from *some* of its members:

- Name
- Email address
- Postal address
- Phone / mobile number
- Photos / video footage
- Subscription payments
- Gift Aid declarations
- Bank details
- Medical information
- Age /DOB
- Gender
- Criminal records check

Not all of this information will be collected from everyone, only personal data that is needed for a specific reason be collected from a member.

Comber Brass will regularly review the data it holds on its members and will remove data no longer needed for the purpose that it was collected. Where a member leaves the band, Comber Brass will delete their personal data unless consent has been given to retain it for a specific purpose. e.g. to retain contact details where a former member is still willing to play occasionally with the band in the future, or for financial reporting purposes e.g. to HMRC.

### **What does Comber Brass use personal data for?**

The information that Comber Brass collects is needed to manage the membership of the band and to organise and run its activities. It may also be needed to enable the band can comply with good practice and other regulatory requirements e.g. safeguarding of vulnerable persons, financial accounting / reporting to HMRC, annual returns to NI Charity Commissioner.

Comber Brass will only collect and use personal data from its members where it has a legitimate interest to do so and will never use it for any other reason, unless consent has been actively given for that additional use e.g. inclusion on the Comber Brass 'general mailing list' to occasionally receive marketing & other promotional communications that may be of interest to its members. Consent given for any such additional use can be withdrawn by a member at any time.

### **Does Comber Brass share personal data with anyone else?**

Comber Brass will never give personal data to third parties for that third party to use (unless it is required by law to do so for a specific purpose – e.g. for financial reporting). If Comber Brass uses 3rd party services (e.g. Google Drive) to store or process personal data, it will only use such services that are deemed to be reputable and secure. If a member's contact information is requested by another member, Comber Brass will only provide it, if that member consents.

### **What can a member request from Comber Brass in relation to personal data?**

Any member can request to view, update or correct any data that Comber Brass holds on them. Any member can also request that the band stops using their data or to erase it. Comber Brass will respond to any such request made by a member within one month.





## **Comber Brass Privacy Statement (new member)**

### **Why does Comber Brass need personal data?**

Comber Brass will collect and store some personal data e.g. your name and email address, in order that it can keep its members informed about rehearsals and engagements, and for other band related activities and administration.

### **What data does Comber Brass collect from its members?**

Comber Brass may need to collect *some* of the following types of data from *some* of its members:

- Name
- Email address
- Postal address
- Phone / mobile number
- Photos / video footage
- Subscription payments
- Gift Aid declarations
- Bank details
- Medical information
- Age /DOB
- Gender
- Criminal records check

Not all of this information will be collected from everyone, only personal data that is needed for a specific reason will be collected from a member. Comber Brass will regularly review the data it holds on its members and will remove data no longer needed for the purpose that it was collected. Where a member leaves the band, Comber Brass will delete their personal data unless consent has been given to retain it for a specific purpose e.g. to retain contact details where an ex-member is still willing to play occasionally with the band in the future, or for financial reporting purposes e.g. to HMRC.

### **What does Comber Brass use personal data for?**

The information that Comber Brass collects is needed to manage the membership of the band and to organise and run its activities. It may also be needed to enable the band can comply with good practice and other regulatory requirements e.g. safeguarding of vulnerable persons, financial accounting / reporting to HMRC, annual returns to NI Charity Commissioner.

Comber Brass will only collect and use personal data from its members where it has a legitimate interest to do so and will never use it for any other reason, unless consent has been actively given for that additional use e.g. inclusion on the Comber Brass 'general mailing list' to occasionally receive marketing & other promotional communications that may be of interest to its members. Consent given for any such additional use can be withdrawn by a member at any time.

### **Does Comber Brass share personal data with anyone else?**

Comber Brass will never give personal data to third parties for that third party to use (unless it is required by law to do so for a specific purpose – e.g. for financial reporting). If Comber Brass uses 3rd party services (e.g. Google Drive) to store or process personal data, it will only use such services that are deemed to be reputable and secure. If a member's contact information is requested by another member, Comber Brass will only provide it, if that member consents.

### **What can a member request from Comber Brass in relation to personal data?**

Any member can request to view, update or correct any data that Comber Brass holds on them. Any member can also request that the band stops using their data or to erase it. Comber Brass will respond to any such request made by a member within one month.

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### **New member confirmation**

I am aware that Comber Brass will collect, hold and use some of my personal data for membership and band administration purposes as described above.

**Name:** ..... **Date:** .....

Marketing and promotions (optional – tick box to confirm)

I would also like to be added to the Comber Brass 'general mailing list' to receive additional marketing and promotional communications.



## **Comber Brass Privacy Statement (non-members)**

As part of your role / relationship with the band, Comber Brass may collect and hold some of your personal data to manage and administer the activities you undertake with us e.g. contact information to arrange dates & times for events, financial details for paying expenses and invoices.

### **What data does Comber Brass collect?**

Comber Brass may need to collect *some* of the following types of data:

- Name
- Email address (business/personal)
- Postal address (business/personal)
- Phone number (business/personal)
- Bank details
- Photos/video footage
- Unique Tax Reference number
- VAT number
- Medical information
- Age/DOB
- Gender
- Criminal records check

Not all of this information will be collected, only personal data that is needed for a specific reason will be collected. Comber Brass will regularly review the data it holds and will remove data no longer needed for the purpose that it was collected. When your role / relationship with the band ceases, Comber Brass will delete your personal data, unless your consent has been given to retain it for a specific purpose. e.g. to retain contact details where you are still willing to help out occasionally with the band in the future, or for financial reporting purposes e.g. to HMRC.

### **What does Comber Brass use personal data for?**

Some of the information listed above may be needed by committee members to manage your relationship with Comber Brass and to organise and administer its activities. It may also be needed to enable the band can comply with good practice and other regulatory requirements e.g. safeguarding of vulnerable persons, financial accounting / reporting to HMRC, annual returns to NI Charity Commissioner.

Comber Brass will only collect and use your personal data where it has a legitimate interest to do so and will never use it for any other reason, unless your consent has been actively given for that additional use e.g. inclusion on the Comber Brass 'general mailing list' to occasionally receive marketing & other promotional communications that may be of interest to you. Consent given for any such additional use can be withdrawn at any time.

### **Does Comber Brass share personal data with anyone else?**

Comber Brass will never give personal data to third parties for that third party to use (unless it is required by law to do so for a specific purpose e.g. for financial reporting). If Comber Brass uses 3rd party services (e.g. Google Drive) to store or process personal data, it will only use such services that are deemed to be reputable and secure. If your contact details are requested from Comber Brass, it will only be provided with your consent.

### **What can you request from Comber Brass in relation to personal data?**

You can request to view, update or correct any of your personal data that Comber Brass holds. You can also request that the band stops using your data or to erase it. Comber Brass will respond to any such request made by you within one month.

### **Confirmation**

I am aware that Comber Brass will collect, hold and use some of my personal data for administration purposes related to my role / relationship with the band.

Name: .....

Date: .....

Marketing and promotions (optional – tick box to confirm)

I would also like to be added to the Comber Brass 'general mailing list' to receive additional marketing and promotional communications.