

## 1 General Statement of Duties

Maghull Wind Orchestra (MWO) has the responsibility to comply with the Data Protection Act (DPA), the General Data Protection Regulation (GDPR), and any applicable successive law or regulation. These set out the standards that must be satisfied when obtaining, recording, holding, using, or disposing of personal data.

MWO aims to have transparent systems for holding and processing personal data.

The Committee will be made aware of this Policy and their duties under this policy.

## 2 The Data Protection Act (DPA)

In order to comply with the DPA, MWO must comply with the eight Data Protection Principles which state that personal data must be:

- Processed fairly and lawfully;
- Obtained only for one or more specified and lawful purposes;
- Adequate, relevant and not excessive;
- Accurate;
- Not kept longer than is necessary;
- Processed in accordance with the individual's rights under the DPA;
- Kept secure; and
- Not transferred to countries outside the European Economic Area unless there is adequate protection to the individual in relation to processing.

## 3 General Data Protection Regulation (GDPR)

Under the GDPR, MWO must comply with the data protection principles sets out that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is

necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

#### **4 Processing of Personal Data**

MWO needs to collect and use certain types of information about members to operate, including personal data as defined by the DPA and GDPR. MWO need to know this basic personal data in order to provide members with information relating to them as a member of the band, or as an attendee of events MWO are involved in.

For example, MWO use member data to:

- inform about MWO concerts and events;
- update about any changes;
- administer instrument / property loan;
- advertise events;
- disclose photographs and names of members of MWO to the media (or allow the media to take photographs of members) for promotional purposes.

MWO will only collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs, or to comply with any legal requirements.

All the personal data we process is processed by The MWO Committee in the UK, however for the purposes of IT hosting and maintenance this information may be located on servers outside of the European Union.

#### **5 Disclosure of Personal Data to Third Parties**

The information that MWO retain to use is for our own communication purposes and will not be shared or sold.

#### **6 Accuracy of Personal Data**

MWO will endeavour to ensure that all personal data held in relation to a member is accurate. Members must notify MWO in writing of any changes to information held about them. A member has the right to request that inaccurate information about them is erased or corrected.

#### **7 Requests for Access to Records (Subject Access Requests)**

All requests for access to records must be made in writing to the MWO Committee. A written response acknowledging the application must be sent to the applicant within 5 working days of the request.

The MWO Committee must authorise the applicant's request for access before any information is disclosed.

A response to a request to be given within 1 month of the written request being received, and MWO:

- must confirm whether personal data is being stored or processed
- give a description of the personal data that is being stored
- the purposes for which the personal data is being processed

MWO must also provide, in an intelligible form, a copy of the information held and, where possible, details of the source of the information.

## **8 Security of Personal Data**

MWO will ensure that only members of The Committee will have access to personal data where it is necessary for them to do so.

MWO will take all reasonable steps to ensure that personal information is held securely and is not accessible to unauthorised persons.

## **9 Retention of Personal Data**

If a member resigns from the band, and they have returned all band property loaned to them, MWO shall immediately and securely dispose of their personal information.

The rehearsal and concert attendance registers are held for 3 years.

## **10 Email Service Provider**

MWO use the MailChimp service as the system to send emails to members of the band. The only personal data stored on the MailChimp system is names and email addresses of members who have completed a registration form.

Members can unsubscribe at any time from these email updates by clicking the unsubscribe link in the email, or by emailing [contactus@maghullwindorchestra.co.uk](mailto:contactus@maghullwindorchestra.co.uk). It should be noted that in unsubscribing members will no longer be able to receive important emails detailing upcoming concerts, set lists or updates from the committee.