PRIVACY NOTICE (GDPR COMPLIANT)

BACKGROUND:

Choir on the Hill (COTH) understands that your privacy is important to you and that you care about how your personal data is used. Our Privacy Policy explains how we will handle your personal information when you sign up to join our choir, or use our website and any other services. Where we say 'we' and 'us' we mean Choir on the Hill (COTH). Where we say 'third party' means anyone who is not you or us. This could be another person or an organisation.

We will regularly review our privacy information to make sure that you are always aware of what information we collect, how we use it and how we might share it. COTH respects your privacy and will only collect and use personal data in the manner described herein adherence to our obligations and your rights under the law.

1. Information About Us

Our contact details Name: Choir on the Hill Registered Address: (address to be confirmed) E-mail: sing@choironthehill.com

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information (i.e. "subject access request").

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you

think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We collect information that you have directly provided to us through signing up to become a member of/volunteer with COTH including information required for us to meet our legal obligations including personal information which is obtained indirectly e.g. from a referee as part of a reference. Information will be held for purposes that include:

- to register or volunteer for our services
- to register a volunteer to help us deliver our aims and ideals
- for payment processing and tracking purposes
- for health and safety reasons such as recording accidents and emergencies
- enable us to communicate with all stakeholders i.e., service users, volunteers, supporters etc including for research
- our Financial Records
- funding
- analytics to ensure we are providing the best possible service we can to you, or to enhance COTH including marketing and operational efficiency.
- profiling to help us to personalise our service, make predictions and recommendations about services we provide, where we provide them, how they

are delivered and/or optimised. To support our funding efforts we may also profile supporters.

Other

We also process personal information relating to supporters e.g. contact details of supporters who make monetary donations. We process personal information when we collaborate with other businesses and institutions. In these instances, in most cases the category of data processed is limited to name and contact details such as email address and telephone number.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. There are 6 acceptable reasons why we are allowed to hold your Data.

Mostly we rely on 3 of these:

• Legitimate interest

We collect usage statistics on attendance and payments

Consent.

When you voluntarily provide additional personal information for your participation as part of COTH, you consent to us collecting and processing that information. You can remove your consent at any time. You can do this by contacting {email address}

Contractual Obligations

To deliver our services

Occasionally we may need to rely on 2 further reasons:

- Where we need it to protect our **vital interests** or someone else's (such as when there are serious Health and Safety issues)
- Where it is needed in the public interest

And if none of these reasons apply, we will ask for your consent to hold Data

How we store your personal information

All of your information is stored in digital form. Your information is securely stored either in limited-access SharePoint Drive folders or Mailchimp (an email management platform). In cases where one of our providers is based outside of the EU, we will have appropriate measures in place as required by privacy law.

If you have signed up to our mailing list, we will keep your name and email address for as long as COTH is operating, or until you unsubscribe and according to our data retention rules. In the case that you decide to unsubscribe from the mailing list, we will dispose of your information by deleting your data from our files.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that

or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept.

| Type of Data | How Long [We] OR [I] Keep It |
|---|--|
| Identity Information including: name, title, date of birth, gender | Immediate permanent deletion or within 6 months after membership end date. |
| Contact information including: address, email address, mobile number | Immediate permanent deletion or within 6 weeks after membership end date. |
| Payment information including: | Immediate permanent deletion or within 6 weeks after membership end date |
| Profile information including Preferences, interests, payment history | Immediate permanent deletion or within 6 weeks after membership end date |
| Health and Safety Data including: accident or injury, allergies | Permanent deletion 6 years after any incident |

8. How and Where Do You Store or Transfer My Personal Data?

We will only store some your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask for details of that personal data and for a copy of it (where any such personal data is held). This is

known as a "subject access request".

11. Our Use of Cookies

We use cookies that are essential to make this website work, we also use aggregated website performance and functional cookies that enable us to better understand how visitors interact with this website e.g. which pages are most visited.

Please see our Cookies Notice for full details.

12. External Websites

If you use a link from this website to access another website or make any request from a third party, our Privacy Notice will cease to apply as soon as you leave this website. Any processing that takes place on another website will be subject to that websites policies.

13. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact:

Email address: sing@choironthehill.com.

14. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be communicated to you. This Privacy Notice was last updated in July 2024.