

Pauline Down

Data Protection Policy and procedure

Pauline Down processes personal information (email addresses and, occasionally, phone numbers) of individuals attending choir sessions, singing workshops, courses and holidays who consent to her doing so. Individuals are invited to subscribe to Pauline's mailing list.

The information will be used to inform subscribers about relevant singing activities or choir events in the case of choir members.

From time to time Pauline takes photographs or videos of members taking part in singing and arts events, with the consent of those involved. These might be used for publicity on the choir's or on Pauline's facebook page, on fliers, and occasionally on Pauline's website. Subscribers are asked for their consent for photos and videos to be shared in this way and have the opportunity to refuse consent or to withdraw consent at any time.

Pauline processes the information in accordance with the Data Protection Act 1998 and the EU General Data Protection Regulation (GDPR) in the following ways:

- **Lawfulness, fairness and transparency**
All new subscribers will be given access to this data protection policy. Data will only be used for the purposes described above.
- **Adequate, relevant and limited to what is necessary**
The information collected will only be what is necessary for promoting relevant singing and arts events that Pauline is offering or for the running of the choir and for establishing and maintaining membership of the choir. No information other than contact details will be collected. The information will not be shared with any 3rd party without permission and will only be shared within the choir or within other participant groups (e.g. Autumn Sing or Singing in Morocco groups) with permission on a strict need to know basis.
- **Accurate and up to date**
All reasonable steps will be taken to ensure that the information is accurate. The email list will be updated regularly. Any inaccuracies will be rectified as soon as possible. Any subscriber can opt out at any time with one click.
- **Only hold the information for as long as is necessary**
The list will be updated regularly (see above).
- **Appropriate control and choice**
Choir members or workshop, course & holiday participants do not have to provide their contact details in order to take part in choir or other events, other than for initial event information and they can withdraw consent for Pauline to hold any information they give her at any time.
- **Security**
Personal data and photos will be held on a password protected computer, and on a secure email list. Any paper copies of personal information will be kept in a locked filing cabinet and shredded when no longer needed.

All rights of data subjects under the Data Protection Act 1998 and the EU General Data Protection Regulation (GDPR) will be respected.

- **Right of access**

All subscribers have a right to access the information held about them free of charge. Pauline will respond to such requests as soon as possible and at the latest within one month of the request.

- **Right of erasure**

All subscribers have a right to ask for all information held about them to be erased. Pauline will respond to such requests as soon as possible and at the latest within one month of the request.

- **Right to complain**

All subscribers have a right to complain to the Information Commissioner's Office if they think that there is a problem with the way their data has been handled.

Signed: