



Random Opera Company

Data Protection Policy and Privacy Statement

July 2021

Data Protection and Privacy

TABLE of CONTENTS

1 THE POLICY

- 1.1 Background
- 1.2 The lawful basis
- 1.3 The individual's rights
- 1.4 Accountability and Governance
- 1.5 Security
- 1.6 Personal Data breaches
- 1.7 Other Considerations

2. PRIVACY STATEMENT

- 2.1 What is covered by the statement
- 2.2 What personal information is collected
- 2.3 Who is responsible for the data
- 2.4 How do we use your personal information
- 2.5 Transfers of personal data
- 2.6 How long do we keep data
- 2.7
- 2.8 Security
- 2.9 Cookies policy
- 2.10 Special Notice - Processing children's personal data
 - 2.10.1 Sensitive Personal Data
- 2.11 Communication methods
- 2.12 Right of access, rectification, erasure and data portability
- 2.13 Right to lodge a complaint
- 2.14 Changes to this statement

1 THE POLICY

1.1 Background

Random Opera Company (including Random Opera Youth Chorus), herein referred to collectively as ROC, is a company limited by guarantee which provides performance opportunities for amateur and professional young and emerging artists. As an organisation that “controls” and “processes” personal data, ROC must comply with the 2018 General Data Protection Regulation.

The GDPR is a wide ranging requirement covering all organisations and much of its content is not relevant to ROC. The purpose of this policy document is to set down how ROC meets its obligations under the Regulation and provides a means for ongoing review.

1.2 The lawful basis

ROC needs to collect and use essential information regarding its performers, customers and others for administrative purposes and to carry out its musical activities including rehearsals, concerts and ad hoc events. ROC recognises its duties under the 2018 General Data Protection Regulation to safeguard this information whether on a database, paper or other means.

The General Director of ROC is the Data Controller (DC) under the Act and decides what and for what purpose personal information is obtained and held.

1.3 The individual's rights

- ROC provides fair processing information to members through a Privacy Statement. shown in Section 2
- Individuals may have access to their personal data and other relevant information on request to the Administration Support by emailing general.director@randomopera.co.uk
- Individuals may have personal data rectified if inaccurate or incomplete or may have it erased or restricted in its use if they wish. ROC only passes personal data to other organisations for a specific purpose (see 2.5) and, therefore there is no need to inform these third parties of changes
- ROC does not engage in automated processing or decision making and the right of data portability is not applicable for the type of data held by ROC.

1.4 Accountability and Governance

- ROC does not use external organisations to process personal data. If it does so in future, ROC will ensure the external processor can provide sufficient guarantees that the requirements of the GDPR will be met.
- ROC is a small organisation with one director. This document, which is regularly reviewed, fulfils its requirement under the GDPR to document its data controlling and processing activities.
- The technical and organisational measures to implement data protection are described in this policy. The GDPR does not require ROC to appoint a Data Protection Officer.
- If Data Protection Impact Assessments become necessary in the future through use of new technology or high processing risk, the Assessments will be recorded as additional appendices to this document.

1.5 Security

Electronically stored personal data in respect of members and choristers, held by ROC, is secured in password protected Microsoft Office files on a personal computer. This data is backed up to Microsoft One Drive internet based storage. Data may also be stored on internet based software such as Google Mail. The computer used for data held by ROC is protected by anti-virus software. Data is also stored on:

- Stripe, a commercial web-enabled software programme designed for managing invoicing and payments.

- SendInBlue, online marketing automation platform that helps us share email and ad campaigns with performers, customers, and other interested parties
- Original forms as detailed in 2.1 are stored and kept by the General Director. Access to these forms is available only on request.

1.6 Personal Data breaches

In the event of a personal data breach the General Director will act promptly to assess the severity of the risk to individuals' rights and freedoms and on the possible consequent need to notify the Information Commissioner's Office and the individuals themselves.

The General Director will take steps to address the breach and the details of the breach and the steps taken will be recorded in an additional appendix to this document.

1.7 Other Considerations

ROC is registered with the Information Commissioner's Office

2. PRIVACY STATEMENT

ROC takes the issue of privacy very seriously and is committed to protecting and respecting our users' privacy online. This Privacy Statement sets out our current data processing practices and should be read in conjunction with our membership agreement. Your privacy matters to us so please familiarise yourself with this privacy statement.

If you have any queries or concerns regarding these practices, you should contact general.director@randomopera.co.uk

2.1 What does this privacy statement cover?

This statement sets out how ROC uses your personal information which is collected by ROC. It explains what personal data is processed and for what purpose, for how long we hold the personal data and the options you have regarding your personal data. Personal data is collected on signing the membership agreement, which provides the consent for ROC to store and process the data, and for children as a legitimate interest.

We collect personal information from:

- a) Registration forms for Random Opera Youth Chorus (ROYC) that are submitted for each chorus member
- b) Consent forms as required for Youth Chorus members to attend events
- c) CVs and other details provided by performers and auditionees
- d) Marketing newsletter subscriptions
- e) Donation receipts

In addition, bank details may be requested for the specific purpose of making refund payments.

2.2 What personal information do we collect?

On joining ROYC we request the following personal information:

- Name
- Address
- School attended
- Age and School Year
- Parents names, addresses, contact phone numbers, email addresses
- Consent for Photography / Video / Audio Recording

For adult performers, we collect any information that has been provided through the individual's CV.

2.3 Who is responsible for the personal information collected?

Your personal data is controlled by ROC, as represented by the General Director.

2.4 How do we use your personal information?

- The information is used by ROC so that we can communicate all relevant information about auditions, rehearsals and performances that you are involved in. Personal data is held for the protection of the children in the care of the organisation.
- Images of participants may also be used on social media where appropriate for the organisations publicity and to promote events.
- The principal method of communication used by ROC is e-mail. Lists are maintained for all participants and every attempt is made to address communications to those groups to which it applies.
- We will seek to ensure that all group communications have the recipient details anonymised. Those participants that inform us that they wish to minimise the amount of communication that they receive from the organisation will only receive the communication that is in their legitimate interest to receive.
- We may send newsletters about up and coming activities or about other events that may interest you.

- We will not pass your email details onto a third party without your prior consent.

To restrict the information you receive, please contact general.director@randomopera.co.uk

2.5 Transfers of personal data

Your personal data will only be transferred to the following named third parties and for the purposes stated:

1. Warwickshire Music Hub – as one of our partners we may be required to advise them of schools attended by our members
2. Venues – Some venues may require details of DBS certificates of adult helpers and/or music team

We will not disclose any personally identifiable information without your permission unless we are legally entitled or required to do so, for example for the purposes of prevention of fraud or other crime, or if we believe that such action is necessary to protect and/or defend the rights of ROC, its property or the personal safety of any members of the Organisation or other individuals.

2.6 For how long do we retain your personal data?

We will retain your personal information only for the period of time necessary for managing your involvement with ROC. We commit to cease communication with you no later than 12 months after any involvement has ceased.

For historical archive purposes only, names of performers and the period during which they were performers will be maintained in perpetuity. Former performers retain the right “to be forgotten” on written request to the General Director.

Personal data held for the specific purposes of maintaining ROC’s accounting records (i.e. details of fees paid) is retained for 7 years from the end of the accounting period involved, in line with that required for ROC’s accounting books and records.

2.8 Security of your personal data

The organisation have implemented data protection policies with the objective of protecting your personal information from unauthorised access and improper use. Access is restricted to our General Director. Information is stored on a market standard software and hosting e.g. Google Drive

2.9 Cookies policy

The term “cookies” refers to a small piece of data that a website asks your browser to store on your computer or mobile device, thus allowing the website to “remember” your actions or preferences over time. The organisation does not currently employ cookies, or other similar technologies, to collect information about you or your preferences, or allow 3rd parties to do so.

2.10 Special Notice – Processing children’s personal data

Definitions of children for the purposes of ROC activities is those individuals aged 18 and under.

2.10.1 Sensitive Personal Data

We may ask for details of your child’s health and medication to ensure the wellbeing of your child whilst in our care. Apart from this ROC will not collect sensitive personal data except where required to by law.

2.10.2 Photographs and Audio Recordings

ROC may take photograph, film events or take audio recordings and these may be published on the Organisations website, social media platforms, newsletters and posters etc. We will not display such photographs unless we have received written or verbal consent of an adult or written parental permission of a child, to use such photographs.

Random Opera Company Ltd, a company limited by guarantee. Incorporated in England and Wales (Company Number: 13431277)

2.11 Communication

The principal method of communication used by ROC is e-mail. Lists are maintained for adult performers, Youth Chorus members, newsletter subscribers, and staff groups, and every attempt is made to address communications to those groups to which it applies. For example, e-mails related to Youth Chorus events will be typically be sent only to Youth Chorus members and their parents.

If you choose to interact with the organisation services such as our Website or content through social media such as Facebook, your personal data (such as your name and the fact that you are interested in the Organisation) will also be visible to all the visitors of your personal page, according to your privacy settings on those social media services. In this case, only the terms and conditions (including the privacy policy) of the social media website apply.

ROC is not responsible for the processing of personal data or the privacy policy of such social media websites, and ROC's Privacy Policy is therefore not applicable.

When you communicate with us through our Facebook page (for example, when you post a comment, upload media, send a personal message or become a fan of us by clicking the "Like" button, we may receive personal data about you (such as your (user) name, profile photo, your home town, your email address and your gender).

How we use your personal data, is described in the applicable Facebook Privacy Policy, which applies in addition to: (i) this Privacy Statement and (ii) the terms of use and other statements from Facebook. Such terms of use and other statements may differ from this Privacy Statement.

2.12 Right of access, rectification and erasure and data portability

You have the right to obtain access to your personal data or request us to rectify it. We will also provide you with information about the purposes of processing your data, the information we process for such purposes, the recipients to whom we have disclosed your personal data and the criteria used for determining the period for which your personal data will be held by us.

You are also entitled to request that we erase your personal data and we will comply with such request without undue delay. In the event we cannot comply with your request, for instance as it relates to your involvement with the organisation, you can request a restriction of the processing of that data – in such case we will only hold and process your personal information for the purposes for which we have agreed.

You have the right to receive personal data that concerns you and which you have provided to ROC, in a structured, digital form and transmit such data to another party, if this is technically feasible.

2.13 Right to lodge a complaint

If you have any issues, queries or complaints regarding the processing of your personal data, please contact the General Director. You also have the right to lodge a complaint with the supervisory data protection authority in the UK, The Information Commissioner's Office (ICO).

2.14 Changes to this Privacy Statement

This Privacy Statement may be changed over time. You are advised to regularly review the Privacy Statement for possible changes but if the changes are significant, we will inform you.

Random Opera Company Data Protection Policy and Privacy Statement	Last Review Date:	July 2021
	Next Review Date:	July 2022