

Privacy Notice

MAIDSTONE MUSIC FESTIVAL – DATA PROTECTION POLICY

OVERVIEW

Key details

- Privacy Notice prepared by: Maidstone Music Festival on 21 May 2018
- Effective date: 25 May 2018
- Next review date: 20 May 2019 (Rewording of one sentence substituted: 21 June 2018)

Introduction

In order to operate, Maidstone Music Festival needs to gather, store and use certain types of information about individuals.

These individuals can include:

- **Staff** - Committee members, other voluntary staff, professional musicians engaged as adjudicators and accompanists, and
- **Supporters** - 'Friends' of the Festival, performers, parents of child performers, music teachers, sponsors, advertisers, and other people the Festival has a relationship with or regularly needs to contact.

This notice explains how this data should be collected, stored and used in order to meet Maidstone Music Festival's data protection standards and comply the General Data Protection Regulations (GDPR) which come into effect on 25 May 2018.

Why is this notice important?

This notice ensures that Maidstone Music Festival:

- Protects the rights of our staff and supporters
- Complies with data protection law and follows good practice
- Protects the Festival from the risks of a data breach

ROLES AND RESPONSIBILITIES

Who and what does this notice apply to?

This applies to all those handling data on behalf of Maidstone Music Festival, for example:

- Committee members and other voluntary staff
- Supporters
- Third party suppliers, such as the Maidstone Area Arts Partnership

It applies to all data that Maidstone Music Festival holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (for example: Dates of birth of child performers, and payments for class fees, Friends subscriptions, etc.)

Responsibilities

Everyone who has access to data as part of Maidstone Music Festival has a responsibility to ensure that they adhere to this notice.

Data Controller

The Data Controller for Maidstone Music Festival is Robert Greenham – Festival Secretary. The Festival Secretary, together with the committee, are responsible for why data is collected and how it will be used. Any questions relating to the collection or use of data should be directed to the Data Controller.

DATA PROTECTION PRINCIPLES

1. We fairly and lawfully process personal data

Maidstone Music Festival will only collect data where lawful and where it is necessary for the legitimate purposes of the organisation. Supplementary to this 'Legitimate Interests' basis, the Festival's other valid lawful bases for processing personal data are 'Consent' and 'Legal obligation', as set out in Article 6 of the GDPR.* (This sentence reworded for clarity on 21 June 2018)

- The name and contact details of committee members, other voluntary staff, professional musicians engaged as adjudicators and accompanists will be collected when they take up a position and will be used to contact them regarding administration related to their role, and also regarding festival activities.
- Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to carry out a DBS check).
- An individual's name and contact details will be collected when they submit an entry for a festival. This will be used to contact them about their entry and to allow them entry to the festival.
- An individual's name, contact details and other details may be collected at any time, with their consent, in order for Maidstone Music Festival to communicate with them about festivals and related activities, and/or for Direct Marketing. See 'Direct Marketing' below.

2. We only collect and use personal data for specified and lawful purposes.

When collecting data, Maidstone Music Festival will always explain to the subject why the data is required and what it will be used for.

We will never use personal data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, except for providing the local authority (Kent County Council) with details lawfully required by virtue of the Child Performance Licensing Regulations, we will never pass on personal data to third parties without the explicit consent of the subject.

3. We ensure any data collected is relevant and not excessive

Maidstone Music Festival will not collect or store more data than the minimum information required for its intended purpose.

For example, we need to collect email addresses and telephone numbers from supporters in order to be able to contact them about festival class dates and times, future festivals and related supporting events, whereas data on their marital status or sexuality will *not* be collected because it is unnecessary and excessive for the purposes of managing and administering the Festival.

4. We ensure data is accurate and up-to-date

Maidstone Music Festival will ask staff and supporters to check and update their data on an annual basis. Any individual will be able to update their data at any time by contacting the Data Controller.

5. We ensure data is not kept longer than necessary

Save for any legal requirement placed upon it, Maidstone Music Festival will keep data on individuals for no longer than 12 months after our involvement with the individual has ceased.

6. We process data in accordance with individuals' rights

The following requests can be made in writing to the Data Controller:

- Staff and supporters can request to see any data stored about them. Any such request will be actioned within 14 days of the request being made.
- Staff and supporters can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- Staff and supporters can request the cessation of receiving any marketing communications. Any such request will be actioned within 14 days of the request being made.
- Staff and supporters can object to: any storage or use of their data that might cause them substantial distress or damage, and any automated decisions made based on their data. Any such objection will be considered by the committee, and a decision communicated within 30 days of the request being made.

7. We keep personal data secure.

Maidstone Music Festival 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. Festival class entry forms) will be stored in a locked receptacle.
- Keys for locks securing physical data files should be collected by the Data Controller 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 staff and supporters where it is clearly necessary for the running of the organisation. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data.

CONTACT BETWEEN STAFF MEMBERS

We only share staff members' data with other staff members with the subject's prior consent

As an organisation comprising volunteers, Maidstone Music Festival encourages communication between volunteer staff.

To facilitate this:

- Volunteer staff can request the personal contact data of other staff in writing via the Data Controller. These details will be given, as long as they are for the purposes of contacting the subject (e.g. an email address or phone number) and the subject consents to their data being shared with other staff in this way.

DIRECT MARKETING

(See next page)

DIRECT MARKETING

Maidstone Music Festival will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote festivals, related concerts, updating them about news, fundraising and other festival activities.

Whenever data is collected for this purpose, we will provide:

- A clear and specific explanation of what the data will be used for.
- A method for users to show their active consent to receive these communications.

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market third party events or 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 MAIDSTONE MUSIC FESTIVAL WEBSITE

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.

Maidstone Music Festival does not currently use cookies on its website in order to monitor and record the activity of its users. However, it is possible that we may in the future introduce the use of cookies as 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.

In that event, we would implement a pop-up box on the website that would activate each new time a user visits the website. This would 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).