



Tilford Bach Society & Tilford Bach Society (CIO) - TBS

Registered charities 230601 & 1172416

Privacy Policy Statement for Both Societies

This statement applies to both societies and personal data is shared fully between the two societies and processed on behalf of both societies. In all activities regarding personal data the two societies act as if they were one. The two societies are referred to as "TBS" in this statement.

Email list

In brief, if you add your name to our email list we will:

- send you typically 2-3 emails per concert informing you and reminding you about our concerts and occasionally about other concerts. They include an unsubscribe option.
- hold your contact details securely and not pass them to third parties other than the data processors whom we use to provide our services
- respect your right to remove your contact details and give you a link to do so in each email
- allow you to see any information held and to correct any information.

Quick Summary

TBS stores contact and payment information as an essential part of its operations and makes extensive use of GoogleDocs and QuickBooks On-line for these tasks. In particular it sends regular emails to members and other contacts about forthcoming concerts that are considered to be of interest and uses MailChimp for this task. TBS complies with all the relevant legislation, and where there are judgements to be made has applied the principle of proportionality bearing in mind that TBS is a small organisation with severely limited resources run by a few unpaid volunteers.

We aim to treat all our contacts in an open, respectful and courteous way and we will delete your personal information on request.

If you would like to know more, please read on.

Objectives

We use personal data only in legal ways in accordance with our objectives which are:

Tilford Bach Society:

The advancement of musical education by the public performance of:-

a. works by J.S.Bach in a manner consistent with the style and demands of his period.

b. works by other composers at the discretion of the Committee.

c. works which the Society may commission.

Tilford Bach Society (CIO):

To advance the education of the general public in the appreciation and understanding of music and its history with special emphasis on the music of Johann Sebastian Bach through:

- *Live performances*
- *Lectures*
- *Conferences*
- *Courses*
- *Visits*
- *Sponsorship of new compositions*
- *Provision and sponsorship of training and performance opportunities for musicians*
- *Cooperation with other music societies*
- *Such other activities as the trustees think fit from time to time.*

Data Controllers

Reginald John Horrocks of Bethany, Chapel Lane, Pirbright, Surrey GU24 0JZ; john@horrocks.co.uk

Mrs Suzanne Cacciottolo of 25 Bargate Rise, Godalming, GU7 2LR; suzanne.cacciottolo@gmail.com

Data Processors

Mrs Susan Marguerite Sagun of 1 Adams Drive Fleet, GU51 3DZ; susansagun@hotmail.com

Mrs Jill Denbigh of 17 Firgrove Court Farnham, Surrey GU9 7QD; jadenbigh@btinternet.com

Third party services as indicated in this document.

Collection of Information

TBS collects information on persons interested in concerts under:

Direct opt-in involving consent through the use of the MailChimp subscription form and this will be recorded through the normal MailChimp arrangements.

"Manually" by sending requests by email and these emails will be recorded.

"Manually" by signing forms for collecting emails and these forms will be stored.

In addition we add to our contacts list from time to time details of persons whom we have reason to believe will be interested in receiving information on concerts. We do this under the provisions of

Article 6.1(f) in pursuit of our "legitimate interests" in promoting music in accordance with our objectives.

Our contact list of some 700 persons has been built up over 5 years and although there is a very low rate of unsubscriptions, typically one per emailing, we have never had complaints from recipients. We consider that this shows that we are using the contact information in a helpful and responsible manner and that this confirms the willingness of the data subjects to receive the information that we send.

Information on Concerts

We send typically 2-3 emails per concert to our list of contacts using MailChimp to inform them about the concerts. Our emails contain links to enable the recipients to unsubscribe.

Legitimate interests assessment (LIA), Balancing exercise and Proportionality Considerations

We believe that our collection and use of contact information (primarily emails) conforms to the guidance from the ICO "Legitimate interest is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing".

We have applied the ICO tests as follows:

1- identify a legitimate interest

Our legitimate interest is the advancement of musical education and this is the purpose of contacting people.

2 - the processing is necessary to achieve it

The processing is primarily the collection, storage and responsible use of email addresses as email is the most cost effective way to inform people about concerts and we collect emails only where we have some reason to believe that the subject is interested in music and concerts.

3 - balance it against the individual's interests, rights and freedoms.

We hold contact information on some 700 contacts and membership information on some 130 members. TBS is run solely by a handful of unpaid volunteers who are at the limit of their resources in continuing with TBS. Since we do not hold passwords, or especially sensitive information such as health, relating to our contacts we consider our use of personal data to be low risk.

We consider that sending information by email is not intrusive (whereas cold calling is intrusive) as emails can easily be deleted and we provide means to unsubscribe. We consider that the risks are more than out-weighted by the benefits to the data subjects in terms of information about concerts.

We receive both email and verbal appreciations of information that we send out about concerts. Overall we consider our practices to be proportionate given the objectives of the GDPR and that we have obtained a good balance in our use of personal information.

Access to Information

We will be delighted to provide anyone with copies of the information that we hold about them. Requests should be sent to chairman@tilbach.org.uk or call 01483 797807.

Disclosure and Erasure

TBS does not disclose personal information to other persons or organisations except as follows:

- Third party data processors MailChimp, GoogleDocs, QuickBooks On-line, Catalyst2, PayPal, CAF Bank and Lloyds Bank as necessary for the use of their services by TBS.
- Names and related email addresses of persons interested in concerts in Woking are disclosed to other Music Societies who run concerts in the Woking area in accordance with the arrangements indicated on the <http://www.wokingconcerts.uk/> website.
- Information about future concerts sent out by email using MailChimp contains reference to this Policy Statement and an option for the recipient to unsubscribe, in which case their data will be handled using the MailChimp arrangements.

If a member or past member unsubscribes we may contact them to confirm whether or not they wish to cease receiving emails from us since this appears inconsistent with continuing as a member and in the past some members have unsubscribed by mistake (clicking the wrong link).

If a member wishes to resign and asks explicitly to have their personal information deleted we will delete this information from our Membership list and lists for past years but their names and related details will remain in our accounting system and bank records as required by other regulations.

We will keep a record of all explicit requests for the deletion of personal information.

Correction and updating

TBS will correct and update any information as soon as reasonably possible after being informed of the need to do so.

Personal Data Audit

Data Stored

TBS holds the following personal data:

- Some or all of name, address, email address, telephone number, membership and sponsor status, geographical interest eg Farnham, Godalming, Woking, and seating preference of its members and persons interested in concerts.
- Payment dates and amounts, any PayPal identifiers, name, address, email address and telephone number of people who have bought tickets or given donations.
- Gift aid declaration forms and records of donations relating to people who have made donations or paid qualifying subscriptions.

- Records including name, address, email address , telephone numbers and bank account name, account number, and sort code of performers who have played for TBS or whom TBS may invite to play including records of expected future fees.
- Name, address, email address and telephone number of representatives of other music societies with whom TBS may cooperate.
- Copies of standing orders for payments to TBS
- In the case of trustees: dates of birth, National Insurance Numbers and availability information.
- The name, date of birth and school attended for persons including accompanied minors aged under 26 for whom claims will be made to Cavatina but since end 2017 this information no longer has to be passed to Cavatina and will be deleted after 5 years.
- Names and email addresses of persons who wish to have information on concerts in the Woking area.

Except as indicated above TBS does not store dates of birth, health or personal preference information. We do not issue or store passwords relating to our data subjects. We have not, and do not intend to, issue cookies ourselves but cookies may be used by the data processors that we use.

Means of storage

Personal data is stored:

- On MailChimp for the purpose of sending emails, accessible only under password
- On GoogleDocs, accessible only under password
- On QuickBooks On-line, accessible only under password
- On the hard drives of the data controllers and processors, accessible only under password
- In the data systems of PayPal, CAF Bank and Lloyds Bank as stored payees
- On the servers of our website host Catalyst2.com based in Northern Ireland, accessible only under password.

Where the above are third party organisations, TBS does not have detailed information on where or how the data is held and the third party organisations are themselves responsible for meeting the relevant regulatory requirements.

Period of Storage

Contact information stored for the purpose of sending out information on concerts will be stored as long as TBS continues, or as long as it appears to be useful, or until the data subject requests its erasure, whichever is the shorter.

Information relating to financial transactions and Gift Aid will be stored as long as required by the relevant regulations (normally six years).

Backups and Deletions

In order to protect the integrity of our stored data, we make periodic back-ups and we retain sets of backed up data in case the data is corrupted by a virus that lies dormant for months or years before spreading. Such a virus would cause us to go back over many back-ups to find uncorrupted data. In practice back-ups are hardly ever used but are a wise precaution. Data held on-line by the third part data processors will also probably be held as many separate successive backups.

When we receive a request for erasure, it will not be practicable for us to go through all the back-ups erasing data but we will erase the data from the current record and record the erasure so that if we need to use backed up data we can erase the relevant items from the backed up data when we start to use it.

Complaints

If you have any concerns about the way in which we process personal information, please address your concerns to our data controllers:

- Reginald John Horrocks of Bethany, Chapel Lane, Pirbright, Surrey GU24 0JZ;
john@horrocks.co.uk
- Mrs Suzanne Cacciottolo of 25 Bargate Rise, Godalming, GU7 2LR;
suzanne.cacciottolo@gmail.com

And they will do their best to resolve your concerns.

You are also entitled to make a complaint to the Office of the Information Commissioner, see <https://ico.org.uk/concerns/>