



Data Protection Policy

Cirencester Choral Society is committed to respecting the privacy of current, prospective and past members, musicians engaged by the Society and those participating in choral events organised by the Society. The Society collects, processes and shares their personal data in accordance with EU General Data Protection Regulation (2016/679), (the "Act"), effective in English Law from 25 May 2018. The Data (Use and Access) Act 2025 (DUAA), which reforms UK data protection law (UK GDPR, DPA 2018, PECR), comes into force in 2026 and will be reflected in the next review of this policy. As such, the Society is a Data Controller under the Act.

Privacy Notice

The Society has posted a Privacy Notice on its website www.cirencester-choral-soc.org.uk where it is available to all members, volunteers and others for whom contact details are stored. A copy of the Notice can be sent by email or in hard copy on request. Data subjects may also contact the society by post via any of the Trustees. If there are material changes to the Privacy Notice, the Society notifies current members of the need to read an updated version on its website. All data subjects are advised to refer to the website from time to time to remain up to date with data protection and other information.

The Privacy Notice explains the Society's policy and practice regarding the following:

1. The data (information and photographs) which are collected and held.
2. Treatment of Sensitive Personal Data ('Special Categories' under the Act).
3. Children
4. How the Society contacts individuals.
5. Individuals' choices about what data are collected and the implications for them of withholding data.
6. The legal basis for the Society to hold personal data.
7. Data retention policy.
8. Disclosure of individuals' personal data.
9. Rights of individuals under the data protection legislation.
 - 9.1. the right to access any personal data held;
 - 9.2. the right to request that any inaccuracies be rectified.
 - 9.3. the right to ask for some or all personal data about them to be erased.
 - 9.4. the right to complain to the Information Commissioner's Office.

Sharing of data between officers of the Society and other designated persons.

Cirencester Choral Society is a registered charity, governed by its Rules administered by a Managing Committee. Information provided by individuals is shared between the Society's officers and committee members, who are all nominated and elected at an AGM by members present or by proxy. Information is also shared, where appropriate, with volunteer members who may not be part of the Managing Committee but may need to

contact or provide services to members. The Society does not and will not provide lists of names and addresses or other contact details to third parties, but the names and voice-part of performers at a concert are provided to the printers of concert programmes for issue to the public.

Data Retention and Destruction

The Society holds current members' extant personal data unless asked by them to delete it. Photographic images in a group context may continue to be used after membership has ceased. Other data must be removed from the Society's records once membership is terminated, unless specific consent has been obtained, except for cases involving disciplinary action where legal recourse might be possible, when the Society's legitimate interests mean that records will be kept for 7 years. Names of those elected to positions in the Managing Committee or serving in other capacities (such as Librarian) without being a committee member are retained indefinitely unless they ask the Society to delete such information.

A complete list of members and their contact details is kept by the Society's Website Manager, Membership Secretary, Treasurer, Chair and Deputy Chair. These details are all held on the home computers of the officials concerned and the Society requires them to agree to keep such information secure and confidential at all times and use blind copy (bcc) when contacting more than one member. For that reason, all general membership communications instigated by them, such as newsletters, must be issued via the Website Manager using MailChimp.

Data Breach Management Policy.

Any breach of the Society's Data Protection Policy which is drawn to the attention of the Managing Committee will be investigated without delay. If the breach is deemed to result in risk to a data subject it must be reported to the Information Commissioner's Office within 72 hours (where feasible). In these circumstances the breach must also be reported to the data subject (if they are unaware) unless subsequent measures mean risk is unlikely to materialise.

The Managing Committee will review this policy annually and maintain an up to date Privacy Notice on its website.

Reviewed March 2026



www.cirencester-choral-soc.org.uk

