

**KINGSTON AND DISTRICT CHAMBER MUSIC SOCIETY ('KDCMS' or 'the Society')**  
**Data privacy policy statement**

This document was prepared in response to the introduction of the General Data Protection Regulation (GDPR) which came into effect on 25 May 2018, and is intended to demonstrate KDCMS's compliance with GDPR requirements.

**Overview of KDCMS's objectives and data requirements**

KDCMS brings together professional, retired professional and amateur musicians and was founded to encourage the practice and performance of chamber music by its members. In order to enable the Society to achieve its objectives, all members are asked to supply their name, address and contact details (telephone numbers, email address) to the KDCMS Hon. Secretary and such data are circulated to all other members through a Members' Directory, which is updated annually, and through the monthly notices. The same data may be gathered and circulated for specific KDCMS events such as concerts, Outings and Workshops organised in any one year. However, it is open to members to request that some of their data (e.g. their postal addresses or their telephone numbers) are omitted from the Directory and notices. All such data constitutes 'personal data' for the purposes of the GDPR. KDCMS does not hold, request or process any 'sensitive' personal data.

The names, postcodes, instruments and weekday availability of each member are also published on the maps of members' locations on the members' forum of the KDCMS website (which is password protected), unless the relevant member requests that the information be omitted from publication.

**GDPR data protection fee**

Having completed the Information Commissioner's Office (ICO)'s self-assessment questionnaire, the Treasurer and the Secretary consider that KDCMS is exempt from paying a data protection fee to the ICO. (<https://ico.org.uk/for-organisations/register/self-assessment/>)

**Data Controller and Data Processors**

For the purposes of GDPR, the KDCMS Committee decided at its March 2018 Committee meeting to appoint a Data Protection team consisting of the Chairman, the Secretary, the Treasurer and another ordinary Committee member, and this team is responsible for adherence to GDPR. In the case of KDCMS, the Committee is the 'Data Controller'. The Chairman, Secretary and Treasurer are the main 'Data Processors'. In addition, individual members tasked with organising Outings, Workshops and such events from time to time are also 'Data Processors'.

The printing company commissioned by KDCMS to print Directories every year and occasionally Outing programmes - currently PDC Design & Print, previously of 10 Castle Street Kingston but now of 342 Hook Rise North, Surbiton, KT6 7LN - is the only third party 'Data Processor'.

**Lawful Basis**

As from May 2018, KDCMS will specifically request members' consent to holding and processing their personal data as part of its new member application form. A one-off request for consent has been sent to all existing members. Absence of consent will lead to their personal data not being included in the new Directory to be printed in autumn 2018.

**Data Audit**

- Personal data provided by members in their application form is collected by the Secretary who shares it with the Treasurer, Refreshments organiser and New Members Coordinators by email and then publishes it in the following concert's Notices and later in the next Directory. The data consists of: name, postal address, email address and telephone numbers.
- A database is kept by both the Secretary and the Treasurer containing data for all current and some past members. This is used as a basis for Directory entries, membership payments tracking record

and communications. It was agreed by the Data Protection team in April 2018 that personal data from non-current members, other than their names, would be erased from both databases one year after their membership terminates.

- In addition, organizers of Spring and Summer Outings and workshops receive personal data from all participants which is shared with other participants for the purpose of communicating in advance of and during the event.

#### **Measures taken by KDCMS to ensure security of data**

1. Databases containing members' personal data are kept on the Chairman's, the Secretary's and the Treasurer's personal computers/laptops, access to which is protected by password. When these databases need to be transferred to another member for KDCMS purposes, the database should be password protected, with the password provided in a separate email or over the telephone.
2. Application forms from new members should be kept by the Secretary for no longer than one year and older application forms from previous years, both paper and electronic copies, should be destroyed by all recipients to whom the Secretary has sent the application forms.
3. Organizers of Outings and workshops and any similar events should delete all application forms, both electronic and paper copies, within one year of the date of the relevant event.
4. All emails sent by the Secretary on a regular basis to large numbers of members are to be sent by blind copy to protect individual members' emails. This practice has from April 2018 been extended to the emails sent by organizers of Outings and Workshops.
5. Directories are only sent to members. KDCMS requires its members not to pass the document on to non-members, not to use it for non-KDCMS purposes and when disposing of past copies of Directories, to do so securely. A reminder to that effect will be added to the Directory for 2018-19. Electronic copies of old Directories will be kept by the Secretary for a year before being destroyed securely.
6. The printing company mandated by the Secretary to print the Directory every year will be required to provide written assurances that it will not disclose any data to third parties and that it meets GDPR requirements.
7. The Chairman, Secretary and Treasurer, upon relinquishing their roles and transferring all KDCMS-related documents to the new incumbents, will be asked to destroy all electronic copies of such documents on their personal computer.
8. Old notices stored on the Secretary's computer – which may contain personal data from new members and amended data from existing members - will be kept by the Secretary for a year before being destroyed securely. However, obituaries of members may be kept for longer periods for the purposes of historical interest.

#### **Scope limitations**

KDCMS members should take note that the Society cannot be held responsible for the security of any former or current members' personal data retained by individual members for their personal use.