

BAMPTON PLAYERS

GENERAL DATA PROTECTION REGULATION POLICY

1.0 Background

1.1 The UK General Data Protection Regulation (GDPR) took effect in May 2018. It replaced the Data Protection Act (2016) and gives individuals more rights and protection in how their personal data is used by organisations. Bampton Players must comply with its requirements, just like any other charity or organisation.

Some of the key principles of GDPR are that personal data shall be:

- **processed lawfully, fairly and in a transparent manner.**
- **collected for specified, explicit and legitimate purposes and not** used in a manner that is incompatible with those purposes e.g. for the Players events, but then using it to contact them about something else entirely
- **adequate, relevant and limited** to what is necessary in relation to the purposes for which they are used.
- **accurate and, where necessary, kept up to date.** Personal data that is found to be inaccurate should be deleted or corrected without delay. All personal data should be periodically checked to make sure that it remains up to date and relevant.
- **kept securely.** Personal data storage should be safe and secure – in lockable filing cabinets or in password protected computers/files.
- **retained data,** will be destroyed/deleted as soon as its purpose has expired or at the request of the data subject.

2.0 Legal bases for using personal data

2.1 There are several legal bases for using personal data, of which consent is one. Others include legal obligation (e.g. processing Gift Aid), contract (e.g. commissioning third parties to do work on our behalf), or legitimate interest, (e.g. routine Bampton players, lists of group members etc). Any registers/lists that are connected to running of Bampton players can be considered as legitimate interest, so players would not need to consent to the collection or display of such data.

3.0 Data Privacy Statement

3.1 The Data Privacy Statement (attached) gives further details.

Bampton Players – Data Privacy Statement

1. Your personal data – what is it? Personal data is information that relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we? Bampton Players have overall accountability and responsibility for ensuring personal data is used within the GDPR acting as the data controller. This means Bampton Players decide how personal data is processed and for what purposes.

3. How do we process your personal data? The Bampton Players shall comply with their obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Bampton Players may use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution.
- To administer Actor and back-room team records.
- To fundraise and promote the interests of the charity.
- To manage our Actor and back-room team.
- To maintain our own accounts and records (including the processing of gift aid applications).
- To inform you of Bampton players' news, events, activities and services.

4. What is the legal basis for processing member personal data? Consent is under Article 6 (1)(a) of the data subject; so, the Bampton players can keep members informed about news, events, activities and keeping members informed about specific Bampton players' events. Also, if processing is necessary for carrying out legal obligations in relation to Gift Aid, contracting with a Third - Party contractor or under or a collective agreement.

5. Sharing member personal data

Member personal data will be treated as strictly confidential and will only be shared with other Bampton players to carry out a service to other members or for purposes connected with the Bampton players. We will only share your data with third parties outside of the Bampton players with data subject's consent.

6. How long do we keep your personal data? We retain Bampton Players actor and backroom team data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, the individual has the following rights with respect to their personal data: -

- The right to request a copy of your personal data which Bampton players holds about you.
- The right to request that Bampton players correct any personal data if it is found to be inaccurate or out-of-date.
- The right to request your personal data is erased where it is no longer necessary for Bampton players to retain such data.
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioner's Office.

8. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Trustee Data Controller.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

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