

Deep Roots Tall Trees (DRTT)

Data Protection Policy – updated 23/05/2018

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). The UK Government has incorporated these requirements into UK law under the Data Protection Bill, with the regulations coming in to force on Friday, **25th May 2018**. The focus of the regulations is to lay out the way in which all organisations handle personal information. They specify the rights of the individual (the data subject) and the responsibilities of any organisation that captures and stores data that can be identified as personal. This includes names, dates of birth, addresses - anything that relates to a person.

DRTT exists to:

“extend the relevance of music, singing and the arts to the widest possible local and regional audience.”

As such, information to enable contact between DRTT and its beneficiaries is an integral part DRTT’s activities and an individual’s involvement with them. DRTT aims to record and use only the minimum amount of information about its beneficiaries to enable its purpose to be achieved.

Within this document, the term “beneficiaries” refers to any individual interested in being kept informed of our activities or projects, or directly taking part in them.

This document sets out DRTT’s approach.

The requirements of the GDPR, and how DRTT will comply, are as follows:

1. More Communication

a) What data does the DRTT record?

GDPR states that organisations will need to give people more information about how and what they do with personal data at the point at which it is collected.

The data DRTT collects is for the purpose of running its charitable activities (e.g. the choir, the dancetheatre group, performances etc.), and to ensure anyone who wants to be informed of these activities receive up-to-date and timely information.

When beneficiaries submit personal details to us, this is done on a paper or electronic form which is stored securely by DRTT’s General Manager. All paper forms received will be transferred to digital format.

Individual details are used by DRTT so that we know who our beneficiaries are, how to contact them, and to keep them abreast of any and all information relating to the activities and projects we run.

These details are not passed or sold onto any other third party for their own use, and we endeavour to keep the personal details we hold on beneficiaries to an absolute minimum. On occasion we do use certain third-party applications (e.g. MailChimp) to facilitate our communication processes, but in such instances the use of the data remains with DRTT and not the third party.

Currently, the full range of details we hold on individuals can include:

- Name
- Address
- Telephone number
- Email address

- Dietary requirements
- Whether weekly and annual subscriptions payments are up-to-date/due/outstanding

b) Who can see these details?

The complete database is only accessible by three people within DRTT:

- The Creative Producer
- The General Manager
- Project Coordinator

All three will access the database for the purposes of:

- emailing beneficiaries with relevant information
- administration
- ensuring, where appropriate, subscription payments are up-to-date

c) What if someone asks for an individual's details or email address?

DRTT will never provide details to another party; the beneficiary list is not provided to any outside person or agency for their own usage in either printed or electronic form. If someone asks for such details, we will send their request to the individual concerned so that they may reply to them if they wish.

Note that, however, we may use third-party online software applications (i.e. "data processors") to facilitate contacting beneficiaries. Any data processors will be checked prior to using them to ensure they are compliant with GDPR legislation. For more detail see paragraph 3 below.

Beneficiary email addresses may be used by DRTT for direct contact about involvement in our activities, but, as above, in no circumstances will they be provided for use by any individual or organisation outside of DRTT.

2. Responding to subject access requests and Data Retention

In most organisations, when someone requests a copy of the personal data that is held about them, this has to be presented within a 40-calendar day period. DRTT will comply with this practice.

a) What happens if I let no longer want to attend and/or be informed of DRTT activities?

For DRTT beneficiaries who no longer wish to attend our activities, or be informed of our activities and projects, it can be requested that their personal details are deleted by contacting the DRTT General Manager, simon.stephoe@deeprootstalltrees.org, who will confirm their request has been actioned and that their details are no longer held by DRTT.

3. Obligations

GDPR policies indicate that there will be direct obligations on data processors as well as on data controllers. At DRTT, we use the following third parties for processing data:

- Mailchimp
Personal details for beneficiaries subscribed to our mailing list are held on the secure MailChimp servers for the purposes of creating e-newsletters. Access to this online database is password protected and only accessible by DRTT staff.

4. Getting consent

Under GDPR it is important we get consent to use beneficiaries' personal data in certain ways; in the case of the DRTT, this is to email them about the DRTT activities they are involved in and which they have indicated they are interested in receiving news about.

During the month of May 2018, we will ask DRTT beneficiaries to update our contact forms and to confirm they are happy to remain on any third-party mailing lists. Communication with such beneficiaries will be

conductor through third-party data processors.

For beneficiaries taking part in our activities directly, we will ask applicants to complete/update, sign and return our contact form, which will also signify their agreement to DRTT retaining and storing their personal data, both in written and electronic form as required under the provisions of the GDPR. This information is essential to the running of DRTT. A signature is proof of agreement. For DRTT beneficiaries, not taking part in our activities directly, but who wish to keep informed of our activities (e.g. mailing list for performances), we will send them an email or letter requesting their contact us if they do not wish to stay on the relevant database concerned and directing them to our website – www.deeprootstalltrees.org/your-data – where they can view this document.

a) Can I keep my contact details confidential from other DRTT beneficiaries?

Our policy is to keep all contact details between DRTT beneficiaries confidential at all times. This will be achieved in group emails by using BCCs (i.e. blind carbon copies). As stated above, if individuals request information of our beneficiaries, we will send the request onto the individual concerned to make direct contact if they so wish.

b) Can I unsubscribe from DRTT emails issued through MailChimp or other third-party mailing house/data processor?

Yes. Details are provided on any such emails you receive with a link to unsubscribe.

5. Children and young people under the age of 16

Whilst DRTT has a policy relating to working with children and young people, we do not hold, and currently do not intend to hold, any personal data on children and young people regardless of their involvement in the organisation.

6. Data breaches

In the unlikely event of a data breach where unauthorised access has been made to access beneficiaries' data, all beneficiaries on the database will be informed.

7. Member's concerns

At DRTT, we have done the best we can to understand and be compliant with the new GDPR rulings that come into effect on May 25th 2018. Whilst we trust that beneficiaries should have no cause for concern about the way their details are kept. Should anyone have any concerns or any questions, then these should be addressed to simon.stepto@deeprootstalltrees.co.uk