

## **INNERLEITHEN PIPE BAND DATA PROTECTION POLICY**

Issue 1

### **1. Introduction.**

In delivering its charitable purpose, Innerleithen Pipe Band, also known as Tweedvale Pipe Band (hereafter referred to as Innerleithen Pipe Band), processes the personal data of its members, supporters, donors and the general public. This data is collected and used by the management committee of the band and shall be handled in accordance with the General Data Protection Regulation (GDPR). Innerleithen Pipe Band's Data Protection Policy (this document) describes what personal data is collected, where it is stored, who can use it and how the rights of individuals are protected.

Individual band members may have collected and stored personal data, for example email addresses or phone numbers of fellow band members, friends or other contacts which they use for their personal use, not directly associated with the management of the band. Such data is not the subject of this policy.

Innerleithen Pipe Band is a Data Controller and Data Processor.

The Band Secretary is the Band's Data Protection Officer.

### **2. What personal data is collected.**

Innerleithen Pipe Band collects the following personal information:

- Name.
- Address.
- Phone numbers – both mobile and landline.
- Email address.
- IP address.
- Date of birth.
- Gender.
- Hat size.
- Shoe size.
- Collar size.
- Member type.
- RSPBA Membership number.
- Emergency contact information.
- Advice, incidents and correspondence including letters, emails, messages and Social Media interactions.
- Pictures, photos and videos (where submitted or captured at events).

Innerleithen Pipe Band may collect your Personal Data in a number of ways. For example, Name, Address, Phone numbers – both mobile and landline, Email address, Date of birth, Gender, Hat size, Shoe size, Collar size, Member type, Emergency contact information will come from membership

forms. We may also collect personal Data through letters, emails and telephone calls and Social Media interactions.

Innerleithen Pipe Band does not collect sensitive personal information as defined in the GDPR. This includes data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

### **Personal Data Provided by third Parties**

Innerleithen Pipe Band uses third party platforms for fundraising and communication purposes and is given the Personal Data collected by these platforms:

- JustGiving
- Easyfundraising
- Facebook
- Google

Innerleithen Pipe Band is satisfied that these third parties meet GDPR regulations.

### **Personal Data Provided to Third parties**

Innerleithen Pipe Band does not share Personal Data with third parties, except for the following:

- Royal Scottish Pipe Band Association (RSPBA) - Personal Data of band members is shared with the RSPBA to allow band members to compete for the band, and to compete as individuals in RSPBA run competitions.
- HMRC – Personal Data of members is shared with HMRC when processing Gift Aid claims.
- Google – Personal Data of members is stored in the Band's Google account.
- Volunteer Scotland – Personal Data of members is shared with Volunteer Scotland when processing PVG's.

Innerleithen Pipe Band is satisfied that these third parties meet GDPR regulations.

## **3. Use of personal data.**

The personal data is collected and processed by members of the Innerleithen Pipe Band Committee and associated Sub-Committees for the purposes of operation of the band, for management of the band's activities, for fundraising, for marketing and for general communications.

In order to comply with Data Protection Laws, Innerleithen Pipe Band needs a legal basis to process your Personal Data. We use the following legal reasons to obtain and use your Personal Data:

- 1. Legitimate Interest** - Innerleithen Pipe Band has a legitimate interest in processing your Personal Data to ensure the efficient running of the organisation and the events associated with delivering our stated Aims & Objectives. **LEGITIMATE INTEREST IS THE MAIN LEGAL BASIS ON WHICH INNERLEITHEN PIPE BAND WILL PROCESS PERSONAL DATA.**

2. **Consent** - Where you have provided your consent, Innerleithen Pipe Band will process your Personal Data for discretionary purposes, specified at the time of collection. A record of this consent will be retained by committee members.
3. **Contract** - In becoming a member of the Innerleithen Pipe Band, you effectively enter into a contract with Innerleithen Pipe Band for the purpose of delivering your membership services allowing you to participate in our events and activities.
4. **Legal Obligation** - We will process your Personal Data to ensure that we comply with legal obligations.

The personal data shall be used in accordance with the permission to use the data given by individuals. The personal data shall not be used for any other purpose and shall not be provided to third parties, except to those third parties specified in Clause 2 above.

#### **RETENTION PERIOD**

Personal data shall only be stored for the period for which it is required, for example for the duration of membership tenure. After that time, the Band will retain certain details for archival purposes. Data which is no longer required, or which is out of date shall be deleted.

#### **4. Where the personal data is stored and who has access to it.**

Personal data is used by the members of the Innerleithen Pipe Band Committee and associated Sub-Committees. Innerleithen Pipe Band does not own any IT equipment for data processing. Personal data is stored on the personal and/or work computers of Committee Members. Personal data is also stored in the Band's Google Account. Personal data which is collected from the band website is stored on the website server.

The following policies apply to the storage and sharing of this data.

1. Personal data stored on personal/work computers shall be protected by a login and password security mechanism. In the case where the personal/work computer is accessible to other parties, the individual files containing personal data should be password protected.
2. Personal data shall not be copied to, or transferred by, USB stick (or other portable storage) unless the files are password protected.
3. When using email address lists, for example to communicate to all band members, the blind copy (bcc) function should be used for individual email addresses, such that the distribution list is hidden from recipients.
4. Personal data held on the Google Drive shall be password protected and accessible only to authorised committee members. Access permission is controlled by the band's Google Drive administrator.
5. Personal data held on the website server shall be password protected and accessible only to authorised committee members. Access permission is controlled by the band's website administrator.
6. Personal data which is held on paper records shall be stored in a safe location, for example at the committee member's home. Where personal data is carried outside of this location, to a band rehearsal, event, or contest, the personal data must be considered as confidential and kept in the committee member's possession at all times.

7. When committee members cease to serve on the committee, any personal data they hold shall be deleted.
8. Personal data may be shared with other committee members for the purposes of management of the band.

## 5. Permission to use the data

Prior to collecting personal data, permission shall be obtained from each individual to store their data and to contact them. Such permission may be gained by use of the membership form, or other means. This is an opt-in process, permission should not be assumed.

## 6. Rights of individuals

Data Protection Laws, describe individuals who have provided their Personal Data to an organisation (either directly or indirectly) as "Data Subjects". As a Data Subject, you have a number of rights with respect to how organisations process your Personal Data.

If you wish to exercise any of your rights, please contact Innerleithen Pipe Band's Data Protection Officer by email to [innerleithenpipeband@gmail.org](mailto:innerleithenpipeband@gmail.org).

1. **Right to be Informed** - As a Data Subject, you have the right to be informed of the use that your Personal Data will be put to, along with details of the Data Controller and your rights.
2. **Right to Access** - Data Subjects have the right to access and obtain a copy of your Personal Data held and processed by Innerleithen Pipe Band on request.
3. **Right to Rectification** - You have the right to request Innerleithen Pipe Band to correct inaccurate or incomplete Personal Data.
4. **Right to Erasure (to be Forgotten)** - You have the right to request Innerleithen Pipe Band to erase your Personal Data from its systems and records. This is not an absolute right however and does not normally apply to purposes covered by Legal Obligation, Legitimate Interest, or if it is necessary for the performance of a Contract.
5. **Right to Restrict Processing** -Data Subjects have the right to request Innerleithen Pipe Band to stop or restrict the processing of your Personal Data. This could be for example, if your Personal Data is no longer necessary for the purpose of processing.
6. **Right to data portability** - You have the right to request a copy of the Personal Data which you have provided directly to Innerleithen Pipe Band which is automatically processed in a portable format.
7. **Right to object** - As a Data Subject, you have the right to object to the processing of your Personal Data, where Innerleithen Pipe Band relies upon Legitimate Interest as the lawful basis for processing.
8. **Rights related to automated decision making including profiling** - You have the right not to be subject to a decision based solely on automated processing (including profiling), which may significantly affect you.

## Complaints

If you are unhappy with how your Personal Data is processed by Innerleithen Pipe Band, you have the right to complain to the Data Protection Officer. If you remain unhappy, following Innerleithen Pipe

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Band's response to your complaint, you have the right to lodge a further complaint with The Information Commissioners Office (ICO). The ICO's address is:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

You can also contact them by telephone on 01625 545745 or via their website at [www.ico.org.uk](http://www.ico.org.uk).

## **7. Registration with the Information Commissioners Office**

Innerleithen Pipe Band is a not-for-profit organisation which only processes information necessary to provide or administer activities for people who are members of the organisation or who have regular contact with it. The band qualifies for exemption from the registration requirements with the Information Commissioner's Office (ICO).

## **8. Maintenance, audit and review**

An initial audit has been carried out to identify what personal data is being held and for what purpose. Such an audit will be repeated from time to time.

It is the responsibility of individual committee members to maintain accurate data, and to delete data which is no longer required.

The committee will review this policy every two years.

## **9. Document History**

June 2018 Policy drafted and circulated for initial review

October 2018 Changes made after discussion at Management Committee

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