May 2020

**Birch Tree Folk Choir Privacy Policy**

A copy of this document will be available on the website ([www.birchtreechoir.com](http://www.birchtreechoir.com)) and at your first choir session. This privacy policy applies to information collected from:

* Customers who have attended at least one Birch Tree Folk Choir session
* Visitors to our website [www.birchtreechoir.com](http://www.birchtreechoir.com)

Purpose of Privacy Policy

The processing and protection of your personal data is governed by the General Data Protection Regulation 2016/679 (the GDPR). This legislation replaces current data privacy law, giving more rights to you as an individual and more obligations to organisations holding your personal data. This new legislation came into effect on 25th May 2018.

As a company we want everyone who comes to us to feel comfortable and confident with how we look after and use any information you share with us. This Privacy Policy will give you information as to the way we use, share, and store your personal information along with information about the increased rights you have in relation to the information we hold on you and the legal basis on which we’re using it.

ICO Registration

Emily Heuvel is the registered data controller of Birch Tree Folk Choir. This means she is responsible for how your personal and sensitive data is processed and for what purpose. If you have any questions around this, please contact me using the information below:

**ICO Number: ZA437502**

Email: emily@birchtreechoir.com

Telephone: 07885 602055

How we process your data

**Contact details**

When you attend your first session with us we ask you to provide your email address and mobile phone number, which we use and store in a variety of ways:

* In order to fulfil our contract with you as a member of the choir, we may use your email address or mobile phone number to communicate performance details, changes to rehearsal schedules etc. Current contact lists for each choir group are kept in individual group leader’s password protected GSuite accounts. These lists are updated termly, with data that is no longer relevant being deleted.
* Reflecting our legitimate interest to keep our customers informed of our business we add new choir member emails to our mailing list. We have completed a legitimate interest assessment and by signing this privacy policy and providing your data your consent is assumed in line with the ‘soft opt-in’. If you would prefer not to be added to the mailing list you are of course free to either inform your group leader not to add you or to withhold your data. A link to unsubscribe from the mailing list can be found at the bottom of every newsletter.

Our website provider, Wix, automatically stores email information:

* When you contact us through the contact form on the website Wix automatically keeps a record of your email. These records are manually deleted once a year.
* When you unsubscribe from the mailing list Wix keeps a record of your email. These records are manually deleted once a year.

Our email provider keeps a record of all email addresses. We keep any relevant email addresses saved as contacts, and once a year delete any other email addresses, along with any saved contacts that are no longer relevant.

Our mobile phones also keep a record of any phone numbers and text messages. We may save relevant contact information to our phones. Any text messages received are deleted at the time of receiving/reply. Once a year any contacts saved that are no longer relevant are deleted.

**Photographs, videos, sound recordings**

Performances and rehearsals may occasionally be photographed, videoed, or recorded, and used in order to promote the choir on our website, social media, and print advertising. By signing this privacy policy you consent to your image being used to market the choir. Any data is stored on a password protected laptop and/or in password protected cloud storage. Images are deleted if they have not been used by up to 5 years.

**Stripe**

When you pay through the website our payment processing company, Stripe, keeps a record of your details. We delete these details once a year.

**Website**

We use analytics software embedded in our website which keeps a record of your IP address. This enables us to market our service as efficiently as possible. By using our website you consent to your data being processed in this way.

**Paper documents**

* Paper copies of privacy policy consent are destroyed after being photographed, and digital copies being stored centrally in our password protected cloud storage.
* Some leaders may keep paper registers in order to keep track of attendance. Digital copies of these are kept in password protected cloud storage, while paper copies are destroyed at the end of each term.

Data sharing

Data may be shared within Birch Tree Folk Choir – specifically between individual group leaders and Emily Heuvel as data controller and company director. We do not share any customer data outside of the company, with the exception of photo and video for marketing purposes.

Your rights

You have the right to ask to see the information held by us about you. To do this please submit a request in writing. You also have the right to ask for information to be deleted, or for information you believe to be incorrect to be rectified. We will endeavour to provide you with the information requested within 4 weeks. If we become aware of a situation where your personal information may have been accidentally or maliciously obtained by a third party we will notify you within three working days, if this is feasible.

If you are concerned about the way your information is being held please discuss it with me. If you are still unhappy you have the right to complain to the Information Commissioner’s Office [www.ico.org.uk](http://www.ico.org.uk).