

## **SALOS GDPR Policy**



SALOS will adhere and aim to be fully compliant to the General Protection Regulation which will be brought into force 25<sup>th</sup> May 2018. This policy will supersede any data protection the society had previously.

For the purposes of the GDPR policy in lines with the regulation data is termed as that of a natural living person and not those who are deceased or that of a company, (contacts within a company are included)

The society hold two types of data:

- members who participate in performances, are life/associated members or sponsors
- Those who wish to be on the mailing list and hear about productions and theatre related information

Only data that is needed is held and processed, no financial information for any members is kept.

### Members Data

By becoming a member consent is automatically given for SALOS to hold relevant personal data, (form attached) This data will only be used to disseminate important society information and other theatre offers, email addresses may be shared with other members in the same production but not outside of these people.

Members are asked to provide emergency contact information of one person, this information will only be used for this purpose.

Members data will be kept for the length of the membership and up to a year after a member has informed the secretary of leaving. On leaving, permission will be requested to add details to the general mailing list.

By becoming members photographic and filming permission is also given to the society for promotional and archival purposed.

### Mailing List

A mailing list is kept to inform those on it of productions and society news. All members have been contacted to see if they wish to continue to be contacted by SALOS. Any of those who do not reply or opt out will be removed. Data will be kept for 18 months and those on the mailing list will be given the opportunity to 'opt out' of receiving data with every communication, whether email or post.

### Young person's data

A child under 16 can not give consent themselves, someone with parental responsibility must provide the consent. Data for under 16s will only be held if they are auditioning or are in a production. Their data will then be treated the same as adult members, however it will not be shared with any other members of the society.

### Processing data

Data will be processed fairly and in a transparent manner, the society will only collect data for a specific purpose explained to the data subjects. Data will only be used for what it was collected for, this data will be accurate and kept up to date. Any out of date or inaccurate data will be erased or rectified.

Any data the society holds will have been obtained by one of the following means:

- Consent given by the subject **(Mailing List)**
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Processing necessary for compliance with a legal obligation
- Processing is necessary to protect the vital interest of a data subject or another person
- Processing is necessary for the performance of a task carried out in the public interest in the exercise of official authority vested in the controller
- Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights of freedom or the data subject. **(Members)**

### Data Controller

The amount of data that SALOS holds is not big enough to have a Data Controller but the committee will always appoint a data administrator that will make sure data is being used and stored in line with this policy. The committee will also review this policy annually, if a breach occurs or if new amendments to the regulation are introduced.

### Data Storage

All data will be kept on the secretary's computer that will be security protected, if data needs to be moved and used by any other committee members one drive will be used for storage and to limit information being emailed to committee members.

Registers will also be digitalised and will only contain names and emergency contact details, these will also be kept on the one drive. The society will use Excel as much as possible and split data between documents if necessary.

Paper copies of any information will only be printed when necessary such as during productions and these will be kept in a file by the Stage Manager or Director.

### Data Sharing

SALOS will never give data to another company or society. If it is requested by an outside company the data subject will be given that company's data and it will be their decision to contact them.

If it is thought that SALOS may wish to share data with other amateur societies in the future permission requests will be sort for all members.

### Viewing Data/Right to Erasure

Anyone whose data is held by the society has the right to either view the data being held or to ask for their data to be erased. SALOS will provide all data held by the society to its owner within 30 days of the request.

If someone requests to be erased for records, all data will be identified then removed, this will include any back up data storage. We will not be able to erase any data that has been published in print such as names in Show Programmes.

### Data Breaches

If there is a data breach it will reported to the ICO under the GDPR breach notifications within 72 hours of finding the breach. (weekends are included in this time) The subject of the breach will only be notified if it is likely to result in a risk of rights and freedoms. If a breach occurs processes and policies will be reviewed and updated.

### ICO Data Protection fees

SALOS is exempt from paying fees as it is a not for profit organisation, if the situation within the society changes this will be addressed.

This policy was written in consultation with NODA guidelines.

**Written:** April 2018

**Review Date:** April 2019