

# Data Protection Policy

## Wirksworth Music Centre Charitable Trust

Last updated	March 25 <sup>th</sup> 2021
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### Definitions

<b>WMC</b>	means <a href="#">Wirksworth Music Centre Charitable Trust</a> a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	Denise Boddy, Trustee
<b>Register of Systems and Privacy Notice</b>	means a register of all systems or contexts in which personal data is processed by WMC

#### 1. Data protection principles

WMC is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed

solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **2. General provisions**

- a. This policy applies to all personal data processed by WMC.
- b. The Responsible Person shall take responsibility for WMC’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, WMC shall maintain a Register of Systems and Privacy Statement.
- b. The Register of Systems and Privacy Statement shall be reviewed at least annually.
- c. Individuals have the right to access their online personal data at any time and requests to access paper/spreadsheet copies shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by WMC must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. WMC shall note the appropriate lawful basis in the Register of Systems and Privacy Statement.

## **5. Data minimisation**

- a. WMC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. WMC shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. WMC will ensure that personal data is kept for no longer than necessary or no longer than is required to comply with our funding obligations/Gift Aid

requirements by HMRC.

## **8. Security**

- a. WMC will ensure that personal data is stored securely using Derbyshire County Council supplied software (which is kept-up-to-date by DCC), with service updates happening as they become available.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, WMC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioners Office

## **END OF DATA PROTECTION POLICY**

Our Website Policy follows below:

### **Privacy & Cookies**

This section of our Privacy Policy is for our website, [www.wirksworth-music-centre.org](http://www.wirksworth-music-centre.org) and governs the privacy of its users who choose to use it. It explains how we comply with the GDPR (General Data Protection Regulation), the DPA (Data Protection Act) [pre GDPR enforcement] and the PECR (Privacy and Electronic Communications Regulations). This policy will explain areas of this website that may affect your privacy and personal details, how we process, collect, manage and store those details and how your rights under the GDPR & PECR are adhered to.

Additionally, it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on this website. Further explanations may be provided for specific pages or features of this website in order to help you understand how we, this website and its third parties (if any) interact with you and your computer / device in order to serve it to you. Our contact information is provided if you have any questions.

### **Use of Cookies**

This website uses cookies to better the users experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system,

allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device.

What are cookies? Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors or use the cookie control system if available upon their first visit.

### **Website Visitor Tracking**

This website uses tracking software to monitor its visitors to better understand how they use it. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

### **Downloads & Media Files**

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti-virus software or similar applications. We accept no responsibility for third party downloads and downloads provided by external third party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

### **Contact & Communication With us**

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the regulations named in 'The policy' above.

### **External Website Links & Third Parties**

Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout

this website. (External links are clickable text / banner / image links to other websites).

### **Shortened URLs**

URL shortening is a technique used on the web to shorten URLs (Uniform Resource Locators) to something substantially shorter. This technique is especially used in social media and looks similar to this (example: <http://bit.ly/2rkboxK>). Users should take caution before clicking on shortened URL links and verify their authenticity before proceeding.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### **Social Media Policy & Usage**

We adopt a Social Media Policy to ensure our business and our associates and employees conduct themselves accordingly online. While we may have official profiles on social media platforms users are advised to verify authenticity of such profiles before engaging with, or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

### **Resources & Further Information**

- [Overview of the GDPR – General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [PayPal Privacy Policy](#)