

The Wells Cathedral Chorister Trust ('the Trust') (registered charity no: 1098277)

Privacy Policy

Approved by the trustees of the Trust on: 6.6.2023(date)

Next scheduled review date: 6.6.2026

Definitions

data protection law – the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) or any relevant variation of them or other relevant applicable UK rule of law relating to data protection

ICO – Information Commissioner's Office

personal data - any information which identifies a person or can be identified as relating to a person

Responsible Person – the Administrator of the Trust who can be contacted by e mail administrator@wcct.co.uk telephone 01749 684738 or by post The Administrator, Wells Cathedral Chorister Trust, School Office, 15 The Liberty, Wells, BA5 2ST

the Trust – The Wells Cathedral Chorister Trust, a registered charity in England and Wales (number 1098227)

1. General provisions

1.1 The Trust is committed to protecting people's privacy and security and to processing personal data in accordance with its responsibilities under data protection law and the principles of UK GDPR. The principles are set out on the ICO's website:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles>

1.2 The Trust seeks to ensure personal data is collected and processed lawfully, fairly and in a transparent manner.

1.3 The Trust takes reasonable steps to ensure personal data is accurate and kept up to date and to ensure the security of personal data.

2. Application and compliance responsibilities

2.1 This policy applies to all personal data processed by the Trust. The Trustees have ultimate responsibility for legal compliance with data protection law, the contents of this policy and the Trust's compliance with it. They have delegated day to day oversight of the Trust's ongoing compliance with this policy to the Responsible Person who must report to the trustees on that compliance by such means and at such frequencies as the trustees at any time decide.

2.2 Any concerns that the Responsible Person has about such compliance with the law or this policy and any breach of security must be reported to the trustees as soon as practicable. Any personal data breach which poses a likely risk to people's rights and freedoms must be reported to them immediately.

2.3 This policy shall be reviewed at least 3 yearly.

3. What information the Trust collects

3.1 The Trust collects personal information which may include names, dates of birth, addresses, telephone numbers and e mail addresses. Other information may be collected where appropriate such as people's preferences for means of communication and contact with the Trust and areas of the Trust's activities they are interested in and wish to be informed about or take part in. Information is collected when people choose to provide it or the Trust requests it.

3.2 Information is collected via the Trust's website, in communications between people and the Trust (by electronic and other methods) and when people seek information from the Trust about its work and activities (for example information about becoming a donor or supporter or about concerts and events arranged to support the Trust). It is also collected when we needed to communicate with people about their donations to, support for or other dealings with the Trust, to provide them with requested access to our events (such as concerts) and when the Trust is legally required to obtain the information (for example in relation to Gift Aid).

3.3 Where necessary the Trust collects financial information, for example in relation to donations, their verification and collection and to meet related legal requirements, such as Gift Aid requirements.

4. How the Trust uses information

4.1 The Trust uses people's information with their explicit consent for the purposes they have provided the information. The Trust also uses it for:

- a) Providing a service they have requested.
- b) Fulfilling a contract with them.
- c) Complying with a legal duty.
- d) For the Trust's other legitimate interests.

4.2 The Trust may also use information for other lawful purposes permitted by data protection law, where necessary and appropriate and in accordance with people's legal rights.

4.3 Therefore in the management and administration of the Trust and the carrying out of its charitable work it may, for example, use information:

- a) To receive, administer and apply donations.
- b) To maintain databases of its donors, supporters, members, volunteers and others involved in or who support the Trust's work (including those who have indicated an intention to make gifts or leave legacies to the Trust).
- c) To fulfil contracts (such as purchase of event or concert tickets).
- e) To perform its legal obligations in relation to its activities and its relationships with people (such as following Gift Aid procedures and keeping required records, prevention of fraud and other crime).
- d) To help it respect people's choices and preferences (for example in relation to communications methods).

5. Disclosing information

5.1 The Trust does not normally share information with or disclose it to any other parties. In circumstances where it might be appropriate or necessary to do so it will obtain their specific consent before doing so (unless there is a legal obligation to share or disclose which overrides the need for consent).

5.2 Information may be disclosed to relevant authorities if required by law without the person's consent (for example in relation to police investigations of alleged criminality).

6. Storing and protecting information

6.1 The Trust stores information on its IT systems including its database, with security measures in place to ensure only authorised people have access and to protect the integrity of the information.

6.2 Information is only held for as long as necessary for the purposes for which it is needed. Periodic cleansing of data is carried out to update it and to remove unnecessary information by secure methods.

7. People's rights

7.1 People have the following rights in relation to their personal data:

- a) To ask for confirmation whether the Trust has their personal data and, if it does, to obtain a copy of the personal information it holds (this is known as subject access request).
- b) To have their data erased (though this will not apply where it is necessary for the Trust to continue to use the data for a lawful reason).
- c) To have inaccurate data rectified or have their data updated
- d) To object to their data being used for marketing or profiling.

7.2 If a person wishes to exercise any of these rights, they can contact the Trust via the Responsible Person. The Trust will deal with any such requests as soon as practicable.

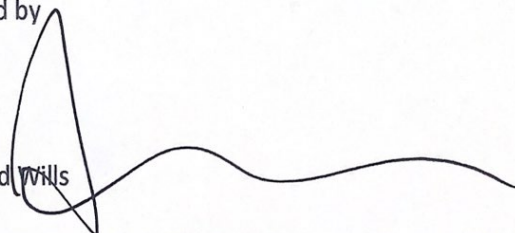
8. Breach of security

8.1 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, the Trust shall promptly assess the risk to people's rights and freedoms and take appropriate risk management and other remedial steps.

8.2 Where a personal data breach which poses a likely risk to people's rights and freedoms is identified, the ICO will be notified without undue delay (not later than 72 hours after becoming aware of the breach).

8.3 Where a personal data breach which poses a high risk to people's rights and freedoms is identified the individuals will be informed directly without undue delay.

Signed by



Arnold Wills

Chairman of Wells Cathedral Chorister Trust, on behalf of the trustees

6-6.23.