



## **General Data Protection Regulation - Privacy Notice** **Last updated February 2020**

### **1) Background to the General Data Protection Regulations**

The General Data Protection Regulations (GDPR) are a 2016 European Directive, which came into effect throughout the European Union (EU) on the 25th May 2018. The directive will continue to apply in the UK, even after this country leaves the EU, in the guise of the Data Protection Act (May 2018).

Under existing data protection legislation, London City Brass - hereafter referred to as LCB - is exempt from registration with the Information Commissioner's Office (ICO) as a data processor, because it only processes members' personal data for internal communications. However, LCB – like many other small social and community organisations – has to comply with the provisions of GDPR.

The GDPR require any organisation, public or private, that processes Personally Identifiable Information (commonly referred to as personal data) to issue a "Privacy Notice" to the people whose personal data it holds. The notice has to contain several key pieces of information:

- responsibility for your personal data
- your rights under GDPR
- the personal data processed
- uses of your personal data (including sensitive data)
- storage of your personal data
- sharing your personal data
- complaints about processing your personal data.

More detailed explanations can be found on the website of the UK data regulator - the ICO at [www.ico.org.uk](http://www.ico.org.uk).

### **2) Responsibility for your personal data**

LCB is responsible for your personal data. LCB is registered in England & Wales under charity number 1186265. It is the data controller of the personal data collected from you, and as such

controls the ways personal data are collected, and the purposes for which personal data are processed (i.e. held and used). Our registered address is:

London City Brass  
249 Buckhurst Way  
Buckhurst Hill  
London  
IG9 6JB

### **3) Your rights**

Set out below are the eight rights enshrined in the GDPR, which you are entitled to exercise in relation to your personal data. Those marked with an asterisk are unlikely to apply to the LCB:

- the Right to be Informed (to know what personal data is held about you and how it was obtained)
- the Right to Access (to get a copy)
- the Right to Rectification (to have any errors or out of date data amended)
- the Right to Erasure (to have any time-sensitive data erased)\*
- the Right to Restrict Processing (to limit the use of personal data - e.g. to restrict contact details published in a members' list, or object to sharing personal data with a 3<sup>rd</sup> party)
- the Right to Portability\* (to be able to transfer personal data to another provider - as with changing a mobile 'phone contract)
- the Right to Object (to have data removed which is not required for data processing)
- Rights relating to Automated Decision Making and Profiling\* (to challenge the use of personal data to predict spending or voting habits etc - c.f. recent scandal involving Facebook and Cambridge Analytica)

You can object to LCB's use of your personal data where we rely on Legitimate Interests as the justification for processing your data.

To raise any objections or to exercise any of your rights about LCB's use of your personal data you can send an e-mail to the Secretary of LCB at [info@londoncitybrass.co.uk](mailto:info@londoncitybrass.co.uk).

If you get in touch, we will come back to you as soon as possible, hopefully within one month. However, if your request is complicated, it may take a little longer, but we will aim to come back to you within 2 months of your request. Please bear in mind that none of the LCB trustees are employed full-time on LCB business, nor are there any other full-time employees of the charity

to handle complaints or requests for copies of personal data. There is no charge for requests. We will ask you to verify your identity before we provide any information to you.

If LCB decides to change this privacy notice, the changes will be circulated to you by e-mail.

#### **4. The personal data which LCB processes**

##### **Types of personal data used in general operations:**

- forename(s) and surname
- telephone number(s)
- e-mail addresses(s)
- images & video footage

##### **Additional types of personal data used for international travel:**

- Passport details
- Date of birth

##### **Source of personal data**

The only personal data held by LCB is that provided by members at the time of joining, or notified by them during the course of their membership. We do not undertake “data mining” (i.e. searching the internet, or accessing public records), purchase mailing lists, or obtain personal data from 3<sup>rd</sup> parties.

##### **Sensitive personal data**

LCB does not hold any sensitive personal data. The following are examples given by the GDPR:

- racial or ethnic origin
- political opinion or affiliation
- religious or political beliefs
- trade union membership
- biometric, health or medical data
- sexual orientation.

#### **5. How LCB uses your personal data**

We can only process your personal data if we have a lawful reason for doing so. According to the General Data Protection Regulations (GDPR) we can only use your personal data for one or more of the following reasons: Consent, Contractual Necessity, Legal Obligation, Legitimate Interests, Public Interest, and Vital Interests.

The objects are unchanged from when the LCB was founded in 2019. LCB’s objects are:

- To advance, improve, develop and maintain public education in, and appreciation of, the art and science of music in all its aspects by any means the trustees see fit, including through the presentation of public concerts and recitals.
- To support such other purposes deemed to be exclusively charitable within the laws of England and Wales as the trustees in their absolute discretion from time to time determine.

LCB will not use your data for any purposes beyond fulfilling LCB's objectives.

This a comprehensive, but by no means exclusive, list of the uses to which personal data is or could be put.

#### **Notifications to all members (Legal Obligation)**

- Annual/Extraordinary General Meeting (AGM/EGM) notices, agenda and minutes
- copy of annual LCB accounts and Chair's report

#### **Notifications to all LCB members (Legitimate Interests)**

- weekly rehearsals
- occasional concerts
- International travel
- networking and social events

#### **Notifications to Committee members (Legal Obligation)**

- Committee meeting notices, agenda and minutes
- Financial information

## **6. Storage of your personal data**

### **Duration of storage**

LCB retains your personal data for the duration of your membership, and up to 6 months after your membership ceases.

Data gathered for international travel is kept only for the purposes of that specific trip and destroyed within 1 month of the trip's completion.

### **Method of storing and protecting your personal data**

LCB members' personal data is currently stored by the Secretary in password-protected files accessible only to authorised officials.

## **7. Sharing your personal data**

### **Sharing LCB members' personal data with 3<sup>rd</sup> parties**

- LCB members' data is not usually shared with 3rd parties except in the following circumstances where some data is shared: promotional activities such as blogs and band biographies in the public domain; brass band registration; contest registration; for travel arrangements
- Photos will be used for publicity and social media campaigns

#### **Sharing trustees' personal data with 3<sup>rd</sup> parties**

- annual notification of names, date of birth and address to the Charity Commission and HMRC

LCB does not share any personal data with any advertisers or data analytics companies.

#### **8. Complaints about processing your personal data**

If you have any complaints concerning LCB's processing of your personal data, please e-mail Secretary of LCB at [info@londoncitybrass.co.uk](mailto:info@londoncitybrass.co.uk).

If you think a breach of data protection laws might have occurred, you have the right to lodge a complaint with the ICO, which is responsible for the protection of personal data in this country.

You can contact the ICO by telephoning 0303 123 1113 or through the ICO website: [www.ico.org.uk](http://www.ico.org.uk).