

# The Irish Association of Barbershop Singers CLG (IABS)



## Data Protection & Retention Policy

Policy prepared by: The Irish Association of Barbershop Singers CLG herein known as IABS

<b>Policy</b>	<b>Version History</b>	<b>Approved by:</b>	<b>Date:</b>
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*Definition: Ensembles – IABS Registered Choruses / Quartets*



# Data Protection

## Guidance to Ensembles/Members

### 1. Introduction

In order to operate IABS needs to gather, store and use certain forms of information about individuals. These can include members, officers, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the group has a relationship with or regularly needs to contact. This policy explains how data should be collected, stored and used in order to meet the data protection standards of IABS and comply with the General Data Protection Regulations (GDPR)(EU)

### 2. Why is this policy important?

**This policy ensures that IABS:**

- Protects the rights of its members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protect the group from the risks of a data breach

### 3. Data Protection Law

The **General Data Protection Regulation (GDPR)** (EU) 2016/679 <https://gdpr-info.eu/> is a regulation in EU law on data protection and privacy for all individuals in the European Union and describes how organisations – including IABS - must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper and on other material. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

IABS recognises and understands the consequences of failure to comply with the requirements of GDPR may result in:

- Criminal and civil action
- Fines and damages
- Personal accountability and liability
- Loss of confidence in the integrity of IABS' systems and procedures
- Irreparable damage to IABS reputation

IABS may also consider taking action where members do not comply with the **General Data Protection Regulation (GDPR)** (EU) 2016/679.



#### 4. Roles and Responsibilities

This policy applies to all members, including committees, officers, directors or anyone involved in the activities of IABS.

This policy applies to all personal and sensitive data processed on computers, stored in paper files and on other material. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Date of Birth for under 18 years of age

Everyone who has access to data as part of IABS has a responsibility to ensure that they adhere to this policy.

IABS uses third party Data Processors (e.g., Eventbrite) to process data on its behalf. IABS will ensure all Data Processors are compliant with GDPR. (EU)

#### **Video/Photography at the contest:**

Members should be aware that during any IABS event, videos/photography will be recorded and uploaded to IABS social media platforms. This data is collected under Legitimate Interest to promote the events of the Association, and to provide delegates at the event or members unable to attend an educational resource for further development.

IABS is the Data Controller and will determine what data is collected, how it is used and are responsible for the secure, fair and transparent collection and use of that data. Any questions relating to the collection or use of data should be directed to the IABS Board of Directors.

#### 5. Data Protection Principle

##### **a) We fairly and lawfully process personal data in a transparent way**

IABS will only collect data where lawful and where it is necessary for the legitimate purposes of the Ensemble. A member's name, contact details, and date of birth (if under 18 years of age) will be collected when they first join their Ensemble and contact details will be used to contact the member regarding group membership, administration and activities.

Other data may also subsequently be collected in relation to their membership, including payment history for subs. Where possible IABS will anonymise this data.

#### **Lawful basis for processing this data:**

- Contract (the collection and use of data is fair and reasonable in relation to IABS completing tasks expected as part of the individual's membership).

The name and contact details of volunteers and contractors will be collected when they take up a position and will be used to contact them regarding administration related to their role. Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a Garda Vetting Process (should it be required))



#### **Lawful basis for processing this data:**

- Contract (the collection and use of data is fair and reasonable in relation to IABS completing tasks expected as part of working with the individuals)

The name and contact details of members entering competitions will be collected when they complete a contest entry form and will be used to contact them with information relating to that competition.

An individual's name and contact details will be collected when they make a booking for an IABS event. This will be used to contact them about their booking and to allow them entry to the event.

#### **Lawful basis for processing this data:**

- Contract (the collection and use of data is fair and reasonable in relation to IABS completing tasks expected as part of the booking)

An individual's name contact details and other details may be collected at any time (including when booking tickets or at an event), with their consent, in order for IABS to communicate with them about and promote group activities.

#### **Lawful basis for processing this data:** Consent (see 'How we get consent')

Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the IABS website' below.

- a) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes and ensure any data collected is relevant and not excessive**

IABS will not collect or store more data than the minimum information required for its intended purpose. IABS needs to collect email addresses from members in order to be able to contact them about group administration and activities.

- b) We ensure data is accurate and up- to- date**

IABS will ask members, volunteers etc. to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting their Ensemble's membership secretary in the first instance and then the IABS Company Membership Secretary.

- c) We ensure data is not kept longer than necessary**

IABS will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records). The storage and intended use of data will be reviewed in line with the IABS Data Protection and Retention Policy. When the intended use is no longer applicable (e.g., contact details for a member who has left the Ensemble), the data will be deleted within a reasonable period.



#### **d) We keep Personal Data secure**

IABS will ensure that data it holds is kept secure.

- Electronically-held data will be held within a password-protected and secure environment Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Access to data will only be given to relevant people where it is clearly necessary for the running of the group. The Data Controller will decide in what situations this is applicable and will keep a master list of who has access to data

#### **e) Transfer to countries outside the EEA**

IABS will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

### **6. Individual Rights**

When IABS collects, holds and uses an individual's personal data that individual has the following rights over that data. IABS will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

- Right of access: individuals can request to see the data IABS holds on them and confirmation of how it is being used. Requests should be made in writing to IABS Company secretary and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- Right to rectification: individuals can request that their data be updated where it is inaccurate or incomplete. IABS will request that members, staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month
- Right to erasure: individuals can request for all data held on them to be deleted, although this will also terminate their membership as IABS needs the information as described in this document to carry out its obligations of membership. IABS data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made, we will comply with the request unless:
  - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation
- Right to restrict processing: individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g., if they have contested the accuracy of any of their data, IABS will restrict the data while it is verified)

Though unlikely to apply to the data processed by IABS, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.



## 7. Member to Member Contact

IABS only share members' data with other members with the subject's prior consent. However, as a membership organisation IABS encourages communication between members.

To facilitate this:

- Members can request the personal contact data of other members in writing via the IABS Membership Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g., an email address, not financial or health data) and the subject has consented to their data being shared with other members in this way

## 8. Cookies on IABS Website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g., a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

IABS use cookies on its website, [www.irishbarbershop.com](http://www.irishbarbershop.com)

We will implement a pop-up box on [www.irishbarbershop.com](http://www.irishbarbershop.com) that will activate each new time a user visits the website. This will allow users to click to consent (or not) to continuing with cookies enabled or to ignore the message and continue browsing (i.e., give their implied consent).



# Data Retention

## 1. Introduction

This policy sets out how IABS will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of IABS Data Protection Policy.

## 2. Roles and Responsibilities

IABS is the Data Controller and will determine what data is collected, retained and how it is used. The Board of Directors is responsible for overseeing the secure and fair retention and use of data by IABS. Any questions relating to data retention or use of data should be directed to The Board of Directors.

## 3. Regular Data Review

A regular review of all data will take place to establish if IABS still has good reason to keep and use the data held at the time of the review

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review.

### Data to be reviewed

- IABS stores data on digital documents (e.g., spreadsheets, databases) stored on personal devices held by IABS Board of Directors/Convention Committee
- Data stored on third party online services (e.g., Google Drive, Dropbox)
- Physical data stored at the homes of IABS Board of Directors/Convention Committee

### Who the review will be conducted by?

The review will be conducted by the Policy Officer, a member of the Board of Directors and the Chairperson.

### How data will be deleted

- Physical data will be destroyed safely and securely, including shredding
- All reasonable and practical efforts will be made to remove data stored digitally
- Priority will be given to any instances where data is stored in active lists (e.g., where it could be used) and to sensitive data
- Where deleting the data would mean deleting other data that IABS has a valid lawful reason to keep (e.g., on old emails) then the data may be retained safely and securely but not used



#### 4. Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use and engagement by the individual	Continue to use	Get consent
Can the data be anonymised	Anonymise data	Continue to use

#### 5. Statutory Requirements

Data stored by IABS may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments made and received (e.g., in bank statements and accounting records)
- IABS Board /Convention Team meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details





## 6. Other Data Retention Procedures

### Member's data

- When a member leaves IABS and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two-year review

### Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible
- All other data will be stored safely and securely and reviewed as part of the next two-year review

### Volunteer and freelancer data

- When a volunteer or freelancer stops working with IABS and all administrative tasks relating to their work has been completed any potentially sensitive data held on them will be deleted
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two-year review

### Other data

All other data will be included in a regular two-year review