



The Irish Association of Barbershop Singers (IABS)

Data Protection and Retention Policy

Policy	Version History	Approved by:	Date:
IABSDPRP	Version 1	The Executive Committee	23/05/2018
IABSDPRP	Version 2	The Executive Committee	20/01/2019

Overview

- Policy prepared for: The Irish Association of Barbershop Singers (IABS)
- Approved by The Executive Committee on: 23/05/2018
- Next Policy review date: 20/01/2021

Introduction

In order to operate, The Irish Association of Barbershop Singers (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 this 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)

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



Data Protection Law

The **General Data Protection Regulation (GDPR)** (EU) 2016/679 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.

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
- DOB 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)

Photography at the contest:

Photographs and videos will be taken during the contest. This data is collected under Legitimate Interest to promote the events of the Association, and to provide delegates at the event an educational resource for further development.

The Irish Association of Barbershop Singers (IABS) is the Data Controller and will determine what data is collected and how it is used and are responsible for the secure, fair and transparent collection and use of data by IABS. Any questions relating to the collection or use of data should be directed to the IABS Executive Committee.



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 group.

A member's name, contact details, and date of birth (if under 18 years of age) will be collected when they first join the group 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 their 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 group 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).

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.

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)

An individual's name and contact details will be collected when they make a booking for an 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.

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

b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes



When collecting data, IABS will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

c) We 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 telephone numbers/email addresses from members in order to be able to contact them about group administration and activities.

d) 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 chorus membership secretary in the first instance and then the Irish Association of Barbershop Singers (IABS) Executive Committee.

e) 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 group), the data will be deleted within a reasonable period.

f) 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.

g) 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.

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.

Individual's 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 the Irish Association of Barbershop Singers (IABS) Executive Committee 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 object: individuals can object to their data being used for a particular purpose. IABS will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- 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.
 - There is a legal requirement to keep the data e.g. gift aid forms for 6 years
- 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.

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 Irish Association of Barbershop Singers or 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
- A printed directory containing contact information for the IABS Committees and contact information for each Member Groups is available. The directory is updated and published annually.

How We Get Consent

IABS will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote other Member Group activities, fundraising and other organisations activities relating to music.

Any time data is collected for this purpose, IABS will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like IABS to send you email updates with details about other Member Group activities, fundraising and other organisations activities relating to music.')

Data collected will only ever be used in the way described and consented to (e.g. IABS will not use email data in order to market 3rd-party products unless this has been explicitly consented to)

Every marketing communication will contain a method through which a recipient can withdraw their



consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or

Cookies on IABS Website

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

We will implement a pop-up box on 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 Policy

Overview

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.

Roles and Responsibilities

IABS is the Data Controller and will determine what data is collected, retained and how it is used. The Executive Committee are 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 Executive Committee.

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. A data review is scheduled for July 2018.

Data to be reviewed

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

Who the review will be conducted by

The review will be conducted by a member of the Executive Committee to be nominated by the Executive Board at the time of the review.

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.

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

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:

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



Other data retention procedures

Member 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 – this might include bank details.
- 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 have been completed any potentially sensitive data held on them will be deleted – this might include bank details.
- 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.