



Phoenixsingers

Phoenix Singers (Suffolk) Data Protection Policy

1. Purpose

Phoenix Singers (Suffolk) ("Phoenix") is committed to handling personal data responsibly and in accordance with UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. As a small, volunteer-led charity, Phoenix only collects and processes personal data necessary to run the choir and its activities.

2. Scope

This policy applies to personal data relating to:

- Choir members
- Trustees
- Any volunteers
- Professional or freelance musicians engaged by Phoenix, including the Music Director
- Supporters and mailing list subscribers
- Concert attendees (where booking data is collected)

It applies to all trustees and any volunteers who handle personal data on behalf of Phoenix.

3. What Data We Collect

Phoenix may collect and hold:

- Names and contact details (email, phone, postal address)
- Emergency contact details (for members)
- Subscription and payment records
- Gift Aid declarations (where applicable)
- Communications relating to choir activities

Phoenix does not intentionally collect sensitive personal data unless necessary (e.g., accessibility or health information relevant to participation) and will only do so with consent.

4. Lawful Basis for Processing

Phoenix processes personal data on one or more of the following lawful bases:

- Contract - to administer choir membership, subscriptions and ticket bookings
- Legal obligation - for accounting records and Gift Aid requirements
- Legitimate interests - to manage choir activities and communicate with members
- Consent - for marketing communications and use of photographs

5. How We Use Personal Data

Personal data will only be used for legitimate choir purposes, including:

- Administering membership and subscriptions
- Communicating rehearsal and concert information
- Managing ticket bookings
- Meeting legal and financial obligations (including Gift Aid records)
- Sending promotional communications (where consent has been given)

Phoenix will not sell or share personal data for commercial purposes.

6. Member-to-Member Communication

Phoenix encourages communication between members but respects privacy.

- Members' contact details will not be shared with other members without their consent.
- Members may request another member's contact details via the Membership Secretary.

- Contact details will only be shared where the individual has agreed to this and only for appropriate choir-related purposes.

A members' contact list may be circulated where consent has been obtained.

7. Data Storage and Security

Phoenix will ensure that personal data is kept secure:

- Electronic data will be stored on password-protected devices or secure cloud services.
- Access will be limited to trustees or volunteers who require it for legitimate choir purposes.
- When a trustee or volunteer leaves their role, access to shared data will be removed.
- Paper records (e.g., Gift Aid forms) will be stored securely.

8. Data Retention

Phoenix will retain personal data only for as long as necessary.

- Membership data - while membership is active and for a reasonable period afterwards.
- Gift Aid declarations and financial records - for at least 6 years in line with HMRC requirements.
- Mailing list data - until an individual withdraws consent.

Data that is no longer required will be securely deleted or destroyed.

9. Individual Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion (where applicable)
- Withdraw consent (where processing is based on consent)
- Object to certain types of processing

Requests should be made to the Membership Secretary (or nominated trustee responsible for data protection).
Phoenix will respond within one month.

10. Data Breaches

Any suspected data breach (e.g., loss of personal data, unauthorised access, accidental disclosure) must be reported immediately to the Chair or nominated trustee.

Trustees will:

- Assess the seriousness of the breach
- Take steps to contain it
- Notify affected individuals where appropriate
- Report to the Information Commissioner's Office (ICO) within 72 hours where legally required

All breaches will be recorded and reviewed.

11. Responsibility and Review

The trustees have overall responsibility for data protection compliance.

A named trustee will act as the lead contact for data protection matters:

Name: William Glasse

Email: william.glasse@gmail.com

This policy will be reviewed annually or sooner if legislation or Phoenix's activities change.

Next Review Date: March 2027

Approved by: Trustees, Phoenix Singers (Suffolk)