

St Luke's Music Society (SLMS) has a policy of treating all personal information supplied to or gathered by it as confidential and of ensuring that it is kept safe and used for specific purposes relevant to SLMS's operation. The General Data Protection Regulations (GDPR) and the associated Data Protection Act that became UK law in May 2018 require SLMS to be specific about the personal data to which it has access, for what purposes that data is used and your consent to that use. That information is set out below.

The designated data manager for SLMS may be contacted by emailing [data@slms.org.uk](mailto:data@slms.org.uk).

## Privacy Principles

SLMS adheres to the following data privacy principles, in compliance with GDPR Article 5:

1. SLMS processes personal data in a transparent way, fairly and lawfully;
2. SLMS collects and uses personal data only for specific, explicit and legitimate purposes and will use the data for those specified purposes only;
3. SLMS ensures any personal data collected is relevant and not excessive;
4. SLMS endeavours to ensure personal data is accurate and up-to-date;
5. SLMS ensures personal data is not kept longer than necessary for regulatory or its operational purposes;
6. SLMS endeavours to keep personal data secure;
7. SLMS will endeavour to keep the storage of personal data within the UK & European Economic Area wherever and whenever possible;
8. SLMS does not make use of any automated decision making or profiling processes.

## Individual Rights

Any individual whose personal data is held by SLMS has the following rights over that data:

1. To be informed of what personal data will be collected and how it will be used;
2. To be supplied on request with the personal data that SLMS holds, such information to be given within one calendar month of the request;
3. To have rectified any incorrect or inaccurate personal data that SLMS holds, that process to be completed within one calendar month of the request;
4. To have personal data deleted on completion of the purpose for which it was collected, or on request, unless it, or part of it, is required to be retained for legal, financial or other regulatory reasons, such deletion to be completed within a reasonable time;
5. To restrict processing of your personal data;
6. To object to the use of your personal data or to withdraw consent for its further use for certain purposes, eg the marketing of non-SLMS-promoted events.

SLMS will ensure its data processes comply with these rights and will make all reasonable efforts to fulfil requests from any individual in relation to these rights in an accurate and timely manner.

## Use of Personal Data

To assist your understanding, the collection and use of personal data is described in more in the sections below:

- A. SLMS website, and ticket and membership purchases made via the website;
- B. Contact Us emails sent by you to SLMS via the website;
- C. Membership, members' subscriptions and gift aid;

D. Non website databases, marketing and other uses of data.

### **A: SLMS website**

The principal purpose of the SLMS website is to provide information to visitors to the website about events promoted or supported by SLMS and to allow the purchase of tickets and memberships. It uses neither browser cookies that can be stored on your computer or mobile device nor any analytical software to identify the unique IP address of your device.

Unless a visitor to the website chooses to purchase either a membership of SLMS or tickets for an SLMS event no personal information is collected. If a visitor to the website does choose to purchase a membership or tickets then the visitor either has to:

1. Create an account, which requires details such as an email address, postal address, creation of a password, and, in the case of a membership purchase, whether SLMS may collect gift aid, all which will be stored in the website database; or
  2. Login to a previously created account, which will contain the data set out above
- in order to provide SLMS with sufficient information to process the purchase.

**NO FINANCIAL INFORMATION IS REQUESTED OR STORED ON THE SLMS WEBSITE OTHER THAN THE VALUE OF YOUR PURCHASE AND DETAILS OF ANY DISCOUNT GIVEN.**

Before completing your purchase you will be asked explicitly either to confirm or dissent from SLMS retaining and using your data. If you choose:

- 'YES' then your data, including some associated data from the Sage Pay transaction needed to complete the purchase, will be retained and used for marketing purposes unless you subsequently request that it be deleted.
- 'NO' then (unless otherwise required by law or statute) your data will only be used in connection with your purchase and maintenance of SLMS's accounting processes and records.

The SLMS website includes links to other websites as follows:

1. The Sage Pay online payment website, which SLMS uses to process payments. When you make an online purchase you will automatically be passed through to Sage Pay to make your payment. SLMS will download data relating to the purchase, which will be treated in the same way as data entered into the SLMS website (see above) but will never acquire any financial data, which is not available to it through Sage Pay.

Membership and ticket purchasers must be aware that they supply their personal details to Sage Pay at their own risk; and

2. Third party external websites such as sponsors, artists etc, using standard browser HTTP functionality – the same way by which you connected to this website. No personal or identifying data is passed to any of these external websites. These links are activated by clicking either on an image or on some text that has a HTTP assignment to the external website. This text is shown typically in a different colour to the other text around it – for example, like [this](#).

A flow chart illustrating the above is attached for information.

Once you move away from web pages within the SLMS website then the SLMS Data Privacy Policy defined here no longer applies and the equivalent policy associated with the next website you visit takes effect. It is recommended you familiarise yourself with the Data Privacy Policy (or equivalent) of subsequent websites as SLMS cannot be held responsible for any breach of your personal data confidentiality on those websites.

### **B: Contact Us emails**

The SLMS website allows you to send an email to SLMS by clicking on links in the 'Contact us' section of the

website. Clicking on one of these links simply initiates the existing email software on your device to open a new window for the purpose of sending an email. The SLMS website does not access either your name or your email address as part of this function; only the specific individual(s) to whom you are sending the email will have knowledge of these items on receipt of your email and will use them solely for the purpose of corresponding directly with you as with all other email correspondence that you use habitually.

### **C: Membership**

If you choose to support SLMS by becoming a Member then some additional information will be collected about you, for example to allow SLMS to reclaim gift aid (if applicable) on your subscription. Your data will also be used to notify you of, for example, special events open to Members and other things directly relevant to your membership.

You should note that St Luke's Church provides administrative assistance to SLMS by processing gift aid applications on its behalf, so if a gift aid claim is to be made on your behalf your details will be passed to St Luke's.

If at the time that you purchase your membership you consent to SLMS using your data, then if you do not renew your membership (which will expire on the 31 August following purchase) your detail will be moved from the membership database and on to the general mailing database (see below, D: Non website databases, marketing and other uses of data) unless you request that your information be removed altogether, in which case it will be deleted in accordance with the SLMS policy outlined above.

If at the time that you purchase your membership you dissent from SLMS using your data, then you will receive a single invitation to renew your membership (which will expire on the 31 August following purchase) and then no further contact unless you accept the invitation to renew.

### **D: Non website databases, marketing and other uses of data**

In addition to data collected through the website, SLMS also collects personal data from individuals completing hardcopy forms either enrolling as an offline member, or asking to be included on a mailing list. These data are combined with data from the website into two databases as follows:

1. A database optimised for mailing details of SLMS events. This database includes only a name and address, the source of the data and whether or not the individual is a Member for the current season. It does **NOT** include email addresses; and
2. A database of Members which includes additional data about the member, including an email if provided, gift aid status and similar details.

These database will only ever be used to provide details of SLMS promoted and directly associated events by post or, in the case of Members, by email.

Information from these databases will never be passed to third parties except that Members' details will be passed to an authorised third party for the sole purpose of processing gift aid claims in SLMS's behalf or pursuant to a statutory obligation.

3. SLMS uses Google Analytics to track website use for its own development and planning purposes. None of the data is shared beyond the Committee and website development team. This is non invasive, only uses IP address data, and can be blocked by users using private browsing or other similar browser protective security measures. More information is available [here](#).

