

## Data Protection Policy Statement

This policy sets out how we will protect personal data including special category data to meet the requirements of the Data Protection Act 2018. The Data Protection Act 2018 requires organisations which process personal data to be transparent about that use and provide individuals with information which explains how their personal data is used by the organisation. The organisation this policy applies to is “Colchester Operatic Society” also known as “COS”, which encompasses its committees, including Colchester Operatic Society Second Edition (known as CO2), and is also referred to as “The Society” in this document.

### Procedures in place to ensure we comply with the Data Protection Act 2018

- We will publish this Data Protection Policy online and clearly direct members and website users to this policy
- We can provide paper copies of this policy on request (contact details in general privacy notice)
- We will publish a general privacy notice (see section 3) on our website
- We will publish specific privacy notices (see section 4) for our members, volunteers and public to access that clearly state how we use their personal data
- We will ensure any letters or forms which collect personal data carry a statement directing individuals to our online notices:

**Colchester Operatic Society fully complies with information legislation. For the full details on how we use your personal information please visit our website <https://www.colchesteroperaticsociety.co.uk/about/privacy-policy/> or speak to our Membership secretary if you are unable to access the internet.**

### How we meet the principles set out in the Data Protection Act 2018

**Principle 1** – Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.

*We ensure that processing is fair by providing privacy notices to individuals whose personal data is being processed. All individuals are advised of their right to contact our membership secretary or chair (who act as Data Protection Officers for the Society) with any queries regarding the processing of their personal data. We will only process personal data fairly, and will not mislead individuals about how their data may be used.*

**Principle 2** - Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

*We meet this obligation by explaining to our members in person and through our privacy notices, why we are collecting and processing their personal data. We will only use the data for the purposes*

*for which it was collected unless we advise individuals, prior to any additional use, of our intentions and the rights they have in relation to any further use.*

**Principle 3** – Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

*We meet this obligation by only collecting what is required for a particular purpose, and ensuring that we have sufficient relevant information for that purpose.*

**Principle 4** – Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay

*We meet this obligation by ensuring that personal data is accurate, and kept up to date where necessary. We will take particular care to do this where our use of the personal data has a significant impact on individuals.*

**Principle 5** – Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals

*We meet this obligation by ensuring that personal data is managed in line with our retention schedule (see section 2), and either deleted, destroyed or completely anonymised when it is no longer necessary for us to use it. The period for which we retain personal data is explained in each privacy notice relevant to that service.*

**Principle 6** – Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

*We meet this obligation through technical and organisational controls. Our organisational controls include:*

- *Appropriate roles and responsibilities (see committee lists and Executive Committee job descriptions)*
- *Restricted access to physical storage of personal data (only stored by Membership secretary, Secretary Chair and/or Appointed member of Exec committee or production team if appropriate/necessary and accessed by relevant personnel as appropriate/necessary)*
- *Security breach management*

*Our Technical Controls include:*

- *Firewalls and anti-malware used on computers processing and storing any data*
- *Role based access controls to email accounts and online and digital storage of personal data (including databases).*
- *Password management*
- *Sending email securely*

**Principle 7** - The controller shall be responsible for, and be able to demonstrate, compliance with the principles

***Our membership secretary and Chair are our appointed Data Protection Officers.** Our membership secretary has a clearly defined role with responsibilities (as detailed in our Executive Committee Job Descriptions) that relate to processing and managing members personal data. They are able to describe what they do and present examples to the necessary authorities if and when necessary. The Chair monitors what the Membership secretary does, supports them and is responsible for setting out procedures to be followed (detailed in this document).*

## What we do if there is a breach in our Data protection procedures

A breach of any of our Data protection procedures is a breach of Information Policy. Breaches will be investigated and appropriate action will be taken as necessary, which will be recorded in the soonest corresponding Executive Committee meeting minutes. Serious breaches of Policy will be reported to the ICO (<https://ico.org.uk/>) and may result in any individuals concerned being dismissed from a production, Committee and/or membership of the Society with or without notice, and/or legal action being taken against them.

## Further advice

If you have any issues over the clarity of these procedures, how they should be applied in practice, require advice about exemptions from the requirements or have any suggestions for amendments, please contact the Chair ([chair@colchesteroperaticsociety.co.uk](mailto:chair@colchesteroperaticsociety.co.uk)) or membership secretary ([membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk)). You can also find further advice on GDPR from the ICO website <https://ico.org.uk/>.

## Section 2

### Retention schedule

Here is a table of what data and information we hold as an organisation, why we hold it, who is responsible for it, where it is held and for how long:

Data and/or Information held	Why we hold it?	Who is responsible for it?	Where is it held?	How long is it held for?
<b>Members names &amp; contact details</b>	To contact members with information about the Society and its productions and events	<b>Membership Secretary processes and stores this information &amp; details are shared with the Secretary, Chair, Marketing Lead and Webmaster</b> (webmaster shares responsibility for maintaining the	Membership forms completed by members are stored by the Membership Secretary, Database stored on Membership Secretary's personal computer and/or google drive, The Society's Website database, The Society's Email accounts address books, Mailchimp	<b>For as long as they are a member-</b> they become past members when they stop renewing membership (see below)

		website database, Marketing lead maintains our mailchimp database and Chair supports both webmaster and marketing lead)	Members database	
<b>Past members names &amp; contact details</b>	To contact past members with information about the Society and its productions and events	<b>Membership Secretary processes and stores this information</b> (Webmaster shares responsibility for maintaining the website database Marketing lead maintains our mailchimp database and Chair supports both webmaster and marketing lead)	Membership forms completed by members are stored by Membership Secretary, Database on Membership Secretary's computer, The Society's Website database, The Society's Email accounts address books, Mailchimp Members database	<b>No more than 20 years</b> (unless the member requests it to be deleted or details become invalid/out of date)
<b>Committee names and contact details</b>	To contact committee members with information about the Society, its productions, events and committee meetings	<b>Secretary</b> creates a contact list which <b>all committee members have access to</b> (unless requested otherwise)	Committee members Email accounts address books, Secretary holds database/contact sheets for committees which are shared digitally and in paper form with other committee members	<b>For as long as a member remains on a committee</b>
<b>Names and Email addresses (marketing list)</b>	To contact interested parties about our productions and events	The <b>Marketing &amp; Events Committee</b> manage our <b>Mailchimp</b> account. Interested parties sign up to receive emails themselves via our website/facebook page. Our Chair and membership Secretary have access to the account also.	Mailchimp database (password protected)	<b>As long as the interested party agrees to receive emails</b> (each email gives them the option to unsubscribe) or until the email address is no longer valid/in use.
<b>Medical details &amp; emergency contacts for cast members and volunteers</b>	To ensure cast members health, safety & well-being at all times	<b>Membership Secretary processes and stores this information.</b> It is passed to <b>appointed Health &amp; Safety</b>	Electronic forms are stored on membership secretary's (and/or appointed Health & Safety representative's) google drive. Paper	From the time the form is completed, for the duration of the production and <b>up to 6 months after a production finishes.</b>

<p><b>of a production</b></p>		<p><b>representative</b> (usually a member of the Exec Committee or Production Team attending rehearsal in place of membership secretary), and shared with First Aiders as necessary, for emergencies &amp; to safeguard members wellbeing.</p>	<p>copies are stored by the Membership secretary or appointed representative and taken in a folder, with restricted access, to rehearsals and performances. Lists of contacts or allergies/conditions of cast may be created and stored by the Membership secretary for quick reference if deemed necessary and/or appropriate. Access is given to appointed First Aiders as and when necessary to safeguard members Health, safety and wellbeing. If the membership secretary is not attending rehearsals they will pass the information to a trusted/appointed Health &amp; Safety Representative (possibly a member of the Production Team or Exec Committee member).</p>	<p>The information is then destroyed.</p>
<p><b>Consent and policy agreement forms</b></p>	<p><b>Show specific</b>-To ensure we have informed consent to take photos and videos of cast members during rehearsals &amp; productions for publicity, programmes and choreography learning purposes, <b>Ongoing membership</b>- To ensure we have informed consent for holding contact information, To ensure all members agree to our rules,</p>	<p><b>Membership Secretary processes and stores this information.</b> This task may be delegated to a member of the production team or another appointed committee member in place of the membership secretary if appropriate (individuals will be informed who holds/processes this information in this instance).</p>	<p>Electronic forms are stored on membership secretary's google drive Paper copies are stored by the Membership secretary, lists of consent received may be created and stored by the Membership secretary for quick reference as necessary/appropriate. This task may be delegated to a member of the production team or another appointed committee member in place of the membership secretary if appropriate (individuals will be informed who</p>	<p><b>For production specific consent and agreement forms</b>- From the time the form is completed, for the duration of the production and <b>up to 6 months after a production finishes.</b> The information is then destroyed. <b>For ongoing membership consent and agreement forms</b>— <b>for as long as they are members and up to 20 years after they stop renewing membership</b> (as deemed appropriate/necessary)</p>

	policies & procedures & codes of conduct <b>Ongoing Volunteers and chaperones-</b> to ensure all volunteers and chaperones agree to adhere to all relevant rules, policies & procedures & codes of conduct		holds/processes this information in this instance).	<b>For ongoing Volunteer &amp; chaperone consent and agreement forms— for as long as they are volunteering and up to 20 years after they stop</b> (as deemed appropriate/necessary)
<b>Committee meeting Minutes</b>	As a record of discussion and decisions in Committee minutes which relate to the organisation and management of the Society	<b>Secretary/Assistant Secretary processes and stores this information.</b>	Paper copies and/or digital copies are held by the <b>Secretary</b> , Digital copies are emailed to all relevant committee members who may then keep their own records	<b>7 years</b>
<b>Contracts</b>	As a record of all terms & agreements signed on behalf of the Society for financial & legal purposes	<b>Business Manager agrees contracts with Terms and conditions and stores signed contracts &amp; agreements.</b>	Paper copies and/or digital copies are kept by the <b>Business Manager</b> . These are often shared digitally with the Chair, Treasurer and any other appropriate committee member at the time of signing.	<b>7 years</b>
<b>Accounts (including receipts, bank statements &amp; bank account information, show budgets, annual and show specific account summaries &amp; Tax returns)</b>	As a record of all financial payments made and received by the Society to be audited independently, annually, and as and when requested by HMRC for Tax purposes	<b>Treasurer, Marketing &amp; events chair has responsibility for the social committee account, overseen by the Treasurer, and Webmaster uploads audited accounts/summaries to the Society website.</b>	Records are kept by the Treasurer (and by the Marketing & Events chair for our social committee account), Audited balances/summaries are uploaded onto the member's area of the Society website by the Webmaster (which has password protected access).	<b>7 years</b>
<b>Programmes</b>	Created for audiences watching our productions with information about the cast, the show and the Society. They are displayed on our website after the production is finished as a public and	Each production programme is the responsibility of an appropriate Designated person (programme co-ordinator) appointed by <b>the Marketing &amp; Events Committee</b> . This	Digital drafts and a final copy are stored by the designated programme co-ordinator on their personal computer. A digital copy is uploaded to The Society website (public access). Audience members who purchase a programme	<b>Ongoing as public record</b>

	historic record of our productions.	person obtains, collates and processes the information necessary (with the relevant individuals consent) to produce an informative programme. The Webmaster uploads the programmes onto the website after productions have finished.	will retain their copy. Cast members are given a programme copy at the end of each production (if sufficient copies available).	
<b>Show and Cast Photos</b>	Taken to publicise our productions, to use in our programmes and as a visual record of our productions. Cast photos are also used to aid production and Creative teams in the cast selection process and for identifying individual cast members	The Society often engages the services of a Professional photographer for rehearsal, show and cast headshots. The images remain their property but are shared with the programme co-ordinator, Marketing & Events Committee, Webmaster and sometimes cast themselves. Cast provide photos of themselves when auditioning which are held by the Membership secretary and shared with the production and Creative team for identification purposes.	Society Dropbox account (password protected access – only shared with relevant/appropriate individuals), selected photos are displayed on the Society’s Website and Facebook page (public access). Photos provided by cast are stored along with their audition forms by the membership secretary. These may be shared with audition panels and creative team as necessary for identification purposes.	<b>Publicity and programme photos-Ongoing as public record</b> , though they are updated regularly and can be removed at an individual’s request <b>Photos provided by cast for auditions</b> are destroyed <b>6 months after a production is finished.</b>
<b>Committee member photos</b>	So members know who the individuals on their committees are.	Assistant Secretary, who produces the Society members’ newsletter, uses the photos in a directory of who’s who, at the end of the	Society members’ newsletters, committee “who’s who” page on Society’s website	Displayed in newsletter and/or committee “who’s who” page on Society website <b>as long as individuals serve on one of our</b>



		newsletter. Webmaster uploads (with consent) any photos to the Society website on committee “who’s who” page.		<b>Committees.</b>
<b>Society Emails (Both sent and received)</b>	For effective communication between the general public, Society members and its’ committees, which is pivotal in the effective management of the Society and its productions and events. Emails are kept as a record of these communications to refer back to if and when needed.	CO2 chair, youth liaison officer and membership secretary have access to the CO2 email account. Marketing & Events committee have access to a society email account. Webmaster, Secretary and Membership secretary receive messages from the Society website. Marketing & events Lead, Secretary, Business Manager, Membership secretary, Safeguarding Lead, webmaster and Chair have individual Society emails they are responsible for.	Email accounts they are sent to/from and/or forwarded to/from.	As deemed necessary/appropriate but <b>no more than 7 years.</b> Most communication is deleted on a regular basis. If it is show specific and/or contains personal data it is deleted immediately or up to 6 months after the relevant production.
<b>Annual General Meeting (AGM) Minutes &amp; reports</b>	Minutes are a record of discussion and voted decisions at annual general meetings of the Society for all members. Reports to members give information on what the Committees have done for the Society over each year.	Reports are written by the relevant committee members: Chair and/or Secretary for Executive committee report; CO2 Chair; Marketing & Events Chair; Youth Liaison Officer. Secretary/Assistant Secretary process and store minutes. The Webmaster uploads all minutes	Paper and/or digital copies are kept by the secretary. Digital copies are also emailed to committee members and are uploaded onto the member’s area of the Society website by the Webmaster (which has password protected access). Paper copies are also distributed to members without internet access/emails.	<b>Ongoing</b> access to all members



		and reports onto the Society Website.		
<b>Equality Monitoring data: Ethnicity, gender/sex, age, marital status, sexual orientation, religion and any disability details</b>	We occasionally carry out Equality Monitoring and ask members to declare their Ethnicity, gender/sex, age, marital status, sexual orientation, religion and/or any disability for ascertaining the demographic makeup of the Society & it's diversity. This is done with explicit consent and there is an option to not disclose this information or complete the form. This is vital in evaluating our progress towards our Inclusion, Equality & Diversity aims (as detailed in our Inclusion, Equality & Diversity Policy, statement and Strategy).	Information is collected, stored and processed by our <b>Membership Secretary, Chair, Secretary and/or Inclusion Lead</b> and may be shared with the Executive, CO2 and Marketing & Events committees as appropriate or anonymously wherever possible. Anonymous reports of the Society membership demographic may be shared with the wider membership, the public and outside organisations.	Paper and/or digital copies are kept by the <b>Membership Secretary, Chair, Secretary and/or Inclusion Lead</b> . Anonymised data is kept digitally by individuals it is shared with for specific purposes and for as long as it is necessary for that purpose.	Individual's data is kept <b>for as long as they are a member</b> . Anonymous data will be stored on an <b>ongoing</b> basis as a matter of public record.
<b>Measurements of cast members</b>	Cast are measured for costume purposes for each individual show.	<b>The wardrobe team</b> for the specific show takes & records cast measurements.	Paper and/or electronic records are held by the Wardrobe Team Leader and shared (anonymously) with specific costume hire companies, as appropriate for the purposes of acquiring the correct sized costumes.	For the duration of the production and <b>up to 6 months after a production finishes</b> . The information is then destroyed.
<b>Volunteer names and contact details and vetting information</b>	To contact the individual regarding support they are offering or can provide to the Society and any productions or events. We vet volunteers working with children	<b>Secretary, chair, Membership secretary and/or safeguarding lead</b> are responsible for contacting volunteers and will pass on details with consent to relevant	Electronically stored within the corresponding email browsers. Stage manager may keep a database of current volunteers' contacts on his personal computer.	For as long as they are interested in volunteering support to the Society and <b>up to 20 years after they've stopped</b> (as deemed necessary and agreed with the individual)

	aged 16 years and under, to fulfil our legal obligation to safeguard our younger members/participants during rehearsals and performances.	individuals. Backstage volunteer contacts are passed to our <b>stage manager and/or wardrobe lead</b> who then manages them. <b>Membership secretary and Safeguarding Lead</b> process <b>vetting information</b> and may <b>share with ECC</b> , in order for ECC to support with DBS checks and issue chaperone licenses. <b>Vetting information for DBS checks and chaperone licences is not stored by COS/CO2.</b>		
<b>Chaperone names, contact details and vetting information</b>	It's our legal obligation to vet Chaperones to safeguard our younger members/participants (aged 16 years and under) during rehearsals and performances. Contact details are kept to keep in contact and provide relevant information on their roles and the productions they are chaperoning for.	<b>Membership secretary and Safeguarding Lead</b> process the information, store the contact details and <b>share Vetting information with ECC</b> , in order for ECC to carry out DBS checks and issue chaperone licenses. <b>Vetting information for DBS checks and chaperone licences is not stored by COS/CO2.</b>	Contact emails are stored electronically on the membership secretary's and/or safeguarding Lead's email account.	Contact details are stored for as long as they are interested in chaperoning for the Society and <b>up to 20 years after they've stopped</b> (as deemed necessary and agreed with the individual).
<b>Contracted Individuals and companies names, contact details, vetting information and safeguarding</b>	Contact details are kept to keep in contact and provide relevant information on their roles and the productions they are working on or may be interested in working on in the future. It's our legal	<b>Membership secretary and Safeguarding Lead</b> process the <b>vetting information</b> needed for DBS checks and may <b>share with ECC</b> , as necessary to support with DBS checks. <b>Vetting</b>	Contact details are electronically stored on <b>Committee Members</b> email accounts and address books. Paper or Electronic copies of Safeguarding checks are stored securely by our <b>safeguarding lead.</b>	Contact details are stored for as long as they are working with and/or are interested in working with/for the Society and <b>up to 20 years after they've stopped</b> (as deemed necessary and agreed with the individual).

<p><b>checks</b></p>	<p>obligation to safeguard our younger members (aged 16 years and under) during rehearsals and performances.</p>	<p><b>information for DBS checks and chaperone licences is not stored by COS/CO2.</b> Our <b>Safeguarding Lead</b> processes and stores completed <b>safeguarding checks.</b></p>		<p>Safeguarding checks are kept for as long as the relevant individual is working with the Society and are reviewed annually.</p>
<p><b>COVID-19 test results</b></p>	<p>Individuals involved in a production are asked to take regular lateral flow tests and report the result to a named COS/CO2 representative In order to comply with COVID-19 specific risk assessments</p>	<p><b>Named COS/CO2 representative (usually a member of the Exec Committee or production team)</b> will look at results and note they have been received. If individuals have chosen to share photos of the result on a closed society Facebook group, the administrator of that group will ensure the photos/posts are deleted once they are no longer needed to be viewed.</p>	<p>Electronic photos shared by email or electronic message are managed by <b>the named representative/individual receiving them</b> and are <b>not</b> stored once they are viewed. Individuals can choose to share photos of results on a <b>closed society production Facebook group managed by listed Facebook group administrators (usually Exec Committee members or members of the production team).</b> Paper/electronic copy check lists of results seen are kept and managed by <b>the named representative.</b></p>	<p>Photos shared directly with the named representative are deleted <b>as soon as they have been viewed.</b> Photos shared to a closed society Facebook group are deleted <b>within or at the end of the production period,</b> as close to the time they have been viewed by the named representative as possible.</p>
<p><b>Information on Financial circumstances (Bursary applications)</b></p>	<p>In order to process and make decisions on bursary applications, applicants may disclose details of their personal financial circumstances or be asked to disclose financial circumstances or provide proof of specific financial benefits they are entitled to, to assess</p>	<p>Initial information is provided to the <b>secretary or membership secretary</b> but will be shared with all <b>Executive Committee members</b> responsible for making the application decisions.</p>	<p>Paper and/or digital copies are kept by the <b>Membership Secretary or Secretary</b> and when shared with <b>Exec committee</b> will be electronically stored within the corresponding email browsers. Electronic forms are stored on membership secretary's or secretary's google drive.</p>	<p>From the time the form is completed, for the <b>duration of the production or bursary it relates to and up to 6 months after a production finishes.</b> The information is then destroyed.</p>

	eligibility and suitability for the bursary as necessary and appropriate.			
--	---	--	--	--

## Section 3

# General Privacy notice

We respect your privacy and are committed to complying with privacy legislation. The information below is what is referred to as a 'Privacy Notice' which explains how we use and protect your personal information.

Our membership secretary and Chair act as Data Protection Officers for the Society, whose role is to ensure that any personal information processed by the Society is processed fairly and lawfully. If you have any concerns or questions regarding how we look after your personal information, please contact our chair by email:

[chair@colchesteroperaticsociety.co.uk](mailto:chair@colchesteroperaticsociety.co.uk) or our membership secretary by email: [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

### 1. What is Personal Information?

Personal information is often records that can identify and relate to a living person. This can also include information that when put together with other information can then identify a person. For example, names, online identifiers or location data.

### 2. What are Special Categories of Information?

This is personal information that needs more protection due to its sensitivity. Information we may hold that counts as special category is likely to include:

- religious or philosophical beliefs
- ethnicity
- details of physical or mental health
- genetic/biometric information

### 3. How we limit the use of personal information

We use personal information to contact our members and interested parties about our productions and events and any other relevant Society information; but wherever possible, the information that we process will be anonymised, pseudonymised or de-personalised. This means the information can no longer identify a person.

We **do not sell** personal information to any other society or organisation for any purpose.

## 4. Why we use personal information

We use personal information to help us run the Society effectively, produce shows and concerts (referred to as productions) for our members to participate in, to promote our productions and events and to safeguard all our members. Please see our retention schedule (section 2 of our Privacy Policy) and our specific privacy notices which explain how we use personal information for specific purposes.

## 5. Your privacy rights

The law provides you with a number of rights to control the processing of your personal information:

### Accessing the information we hold about you

You have the right to ask for all the information we have about you. When we receive a request from you in writing, we must normally give you access to everything we have recorded about you. However, we will not let you see any parts of your record which contain:

- Confidential information about other people; or
- Information a committee member thinks will cause serious harm to your or someone else's physical or mental wellbeing; or
- If we think that the prevention or detection of crime may be adversely affected by disclosing information to you.

This applies to paper and electronic records. If you ask us, we will also let others see your record (except if one of the points above applies). If you cannot ask for your records in writing, then please speak to our membership secretary or chair who will take a verbal request in person. If you have any queries regarding access to your information please contact [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

### Changing information you believe to be inaccurate

You should let us know if you disagree with any information we may hold about you. Wherever possible we will change or remove incorrect information. Please use the contact details above to report inaccurate information.

### Asking for your information to be deleted (right to be forgotten)

In some circumstances you can request the erasure of the personal information used by us, for example:

- Where the personal information is no longer needed for the purpose for which it was collected
- Where you have withdrawn your consent to the use of your information and there is no other legal basis for the processing
- Where there is no legal basis for the use of your information
- Where erasure is a legal obligation

Where personal information has been shared with others, we shall make every reasonable effort to ensure those using your personal information comply with your request for erasure.

Please note that the right to erasure does not extend to using your personal information where:

- It is required by law
- It is used for exercising the right of freedom of expression
- It is in the public interest in the area of public health
- It is for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes where it would seriously affect the achievement of the objectives of the processing
- It is necessary for the establishment, defense or exercise of legal claims.

## Restricting what your information is used for

You have the right to ask us to restrict what we use your personal information for where one of the following applies:

- You have identified inaccurate information, and have notified us of this
- Where using your information is unlawful, and you wish us to restrict rather than erase the information
- Where you have objected to us using the information, and the legal reason for us using your information has not yet been provided to you

When information is restricted it cannot be used other than to securely store the information, and with your consent, to handle legal claims, protect others, or where it is for important public interests of the UK. Where restriction of use has been granted, we will inform you before the use of your personal information is resumed.

You have the right to request that we stop using your personal information in some circumstances, for example where we are relying on your consent.

## Computer based decisions about you and if you are 'profiled'

You have the right to object about decisions being made about you by automated means (by a computer and not a human being), unless it is required for any contract you have entered into, required by law, or you have consented to it. You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information.

If you have concerns regarding automated decision making, or profiling, please contact us so we can advise you about how your information is being used.

## 6. Who will we share your personal information with?

The law does not allow us to share your information without your permission, unless there is proof that someone is at risk or it is required by law. This risk must be serious before we can go against your right to confidentiality. When we are worried about physical safety or we feel that we need to take action to protect someone from being harmed in other ways,

we will discuss this with you and, if possible, get your permission to tell others about your situation. We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away. If this is the case, we will make sure that we record what information we share and our reasons for doing so. We will let you know what we have done and why as soon as or if we think it is safe to do so.

We use a third party data controller called Mailchimp to compile and operate a marketing mailing list. You can read more about how Mailchimp uses your personal information here: <https://mailchimp.com/legal/privacy/>.

## 7. How do we protect your information?

We will do what we can to make sure we hold personal records (on paper and electronically) in a secure way, and we will only make them available to those who have a right to see them. Our security measures include:

- Encryption allows information to be hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or cypher. The hidden information is said to be encrypted
- Controlling access to systems, hard copy records and buildings allows us to stop people who are not allowed to view your personal information from getting access to it
- Ensuring our Society Officers and Committee members are aware of how to handle information and how and when to report when something goes wrong.
- Ensuring there are ways for us to access your information should something go wrong with any online/computer systems being used
- Keeping up to date with the latest security software updates on computer systems used to process and store personal information
- **Wherever possible your information will not leave the UK. Some electronic database systems used maybe hosted outside of the UK but within the EEA. We will inform you if any personal data is hosted or shared with 3<sup>rd</sup> parties who operate outside of the EEA and where information may be accessible outside of the UK or EEA through our Privacy notices.**

## 8. How long do we keep your personal information?

Our retention schedule (see section 2 of our privacy policy) lists how long your information may be kept for different purposes.

## 9. Where can I get advice?

You can contact our Membership secretary via email at [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk) or our Chair via email at [chair@colchesteroperaticsociety.co.uk](mailto:chair@colchesteroperaticsociety.co.uk). Alternatively you can write to Colchester Operatic Society at:



15 Parkside Quarter  
Colchester,  
Essex  
CO1 1EA

For independent advice about information protection, privacy and information sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number  
Alternatively, visit [ico.org.uk](http://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk).

## 10. Cookies & how you use this website

To make this website easier to use, we sometimes place small text files on your device (for example your iPad or laptop). These are known as 'cookies'. Most big websites do this too. They improve things by:

- remembering the things you've chosen, so you don't have to keep re-entering them whenever you visit a new page
- remembering information you've given (for example, your address) so you don't need to keep entering it
- measuring how you use the website so we can make sure it meets your needs.

By using our website, you agree that we can place these types of cookies on your device.

We do not use cookies on this website that collect information about what other websites you visit (often referred to as privacy intrusive cookies).

Our cookies aren't used to identify you personally. They're just here to make the site work better for you. Indeed, you can manage and/or delete these files as you wish using your own web browser settings.

To learn more about cookies and how to manage them, visit [AboutCookies.org](http://AboutCookies.org).

### Other people's cookies

We sometimes use videos from YouTube and feeds from other websites such as Facebook and Twitter. These websites place cookies on your device when watching or viewing these pages.

Below are links to their cookie policies:

- [Google and YouTube](#)
- [Facebook](#)
- [Twitter](#)

## Turning off cookies

You can stop cookies being downloaded on to your computer or other device by selecting the appropriate settings on your browser. If you do this, however, you may not be able to use the full functionality of this website.

There is more information about how to delete or stop using cookies on [AboutCookies.org](https://www.aboutcookies.org). If you wish, you can also opt out of being tracked by Google Analytics – for more information see [Google's privacy policy](https://policies.google.com/privacy).

Further guidance on the use of personal information can be found at [ico.org.uk](https://ico.org.uk)

## Section 4

### Specific Privacy Notices

Our Specific Privacy Notices contain the following:

- The Identity and contact details of the Data Controller, any Data Processors (if applicable) and the name of the responsible Data Protection Officer
- The purpose of processing and the legal basis supporting the processing
- (Where applicable) The legitimate Interests of the Data Controller or 3rd Party
- Any third party recipient (or categories of recipients) of the data
- The retention period (or the criteria to be used to determine one) at the end of which it will no longer be necessary to process the data.
- Which of the Data Subject's rights will be applicable to the processing (or confirm that all rights are applicable)
- (If consent is being relied upon) Advise the Data Subject of their right to withdraw consent at any time
- Advise the Data Subject of their right to lodge a complaint with the Information Commissioner's Office if they have concerns over the processing
- Make the Data Subject aware of any automated decision making/ profiling being undertaken as a part of the processing and information about:
  - How decisions based on the data are made
  - The significance and consequences of the decisions.
- (Where data is obtained directly from the Data Subject):
  - The specific statutory/ contractual requirement/ obligation
  - The consequences of not providing personal data
- (Where data is not obtained directly from the data subject):

- Where the data is coming from and whether this is from publicly accessible sources
- The categories of personal data

The Notice must be available to the Data Subject:

Criteria		Action
if the data is being obtained directly from the Data Subject		At the time data is obtained
if the data is not being obtained directly from the Data Subject...	(no additional criteria)	Within a reasonable period of having obtained the data (within one month)
	...AND if data is to be used to communicate with the Data Subject	<i>At the latest</i> , when the first communication takes place
	...AND is to be disclosed to a third party	<i>At the latest</i> , before the data is disclosed.

Our specific privacy notices are:

- Processing Membership Data – Annex A
- Processing Committee Data – Annex B
- Processing Data for Marketing Purposes – Annex C
- Publishing Programmes – Annex D
- Processing and Publishing Digital Images – Annex E
- Processing Volunteer and Chaperone Data – Annex F
- Processing Contracted Individuals' and Companies' Data – Annex G

# Annex A – COS Privacy Policy



## Processing Membership Data

Information about our members is provided by the individual members (or in the case of under 16's by their parents/carers - their legal guardians).

Our membership secretary is the primary Data Controller and processor of Membership Data information. Our Secretary, Chair, Marketing Lead and Webmaster are secondary data controllers & processors of Membership Data information.

**When you join the society** you are asked to complete a form that collects the following personal information:

- Names and address
- Contact details
- Date of birth
- Signature

This information is used by the Society to identify members, ensure you are eligible to join either COS or CO2 (our younger branch of the Society), ensure we are meeting legal requirements with regard to chaperoning at rehearsals and productions, to know the age demographic of our membership (data would be anonymised in this instance) and to contact you with information about the Society and its productions and events, with your consent. Your signature acts as an agreement to us holding and using the data (as per our privacy policy, which includes this privacy notice) and to paying the membership fee for the year.

The above information will be processed and put into a central Database held by the membership secretary digitally. Names and email addresses will then be entered into the Society email address book (which is only accessed by the Membership secretary, and for our CO2 email address our youth liaison Officer and CO2 Chair also have access). You can then receive emails from us about the Society and its productions and events. These details are shared with our Secretary and Chair who also stores them in their Society email address book in order to contact members. They are also shared with our Webmaster who stores them on our website (see details below) and our Marketing Lead who uses a third party data controller called Mailchimp to send you emails. This is password protected online communication tool and offers you the option to unsubscribe to our Mailchimp emails at the bottom of every email. (You can read more about how Mailchimp uses your personal information here: <https://mailchimp.com/legal/privacy/>). Those without email addresses will receive the information by post.

Membership is annual at a cost of £10.00. If this fee is not paid each year you cease to be a member and become a “past member”. We may delete your information at

## Annex A – COS Privacy Policy

any time should you cease to be a member and you will therefore not be contacted with further information about the Society and its productions and events. However, we understand our members leave for periods of time and return again, depending on the shows/concerts we are producing, so with your permission we may hold onto contact information and continue to contact past members with information about the Society and its productions and events for up to 20 years after you cease paying membership.

You can withdraw consent for us to contact you at any point by contacting us at [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

You will also be asked if you have access to a computer and if you would like access to our members' area of our website. To enable access we enter your names and email address into our website membership database (only accessed by the Membership secretary, Chair, Webmaster and IT support when and if necessary).

Our Webmaster and Website host (paid 3<sup>rd</sup> party) are secondary processors and controllers of the website membership database.

By entering your information in the website database we can set up a personal log in for you to access our members' only area of the website ([www.colchesteroperaticsociety.co.uk](http://www.colchesteroperaticsociety.co.uk)). You will then be sent a website user name and randomly generated password which you can log in to the members' area with and then change to a more memorable password that will only be known to you. Once you cease being a member you will no longer have access to the member's area of the website but we may keep your details on the database for up to 20 years after you cease being a member, in case you return to being a member and this then limits the amount of processing we have to do.

You can request your details be removed from the website database at any time but this will mean you no longer have access to the members' area of our website.

We do not share your contact details with other organisations or individuals unless you give us specific permission to do so. If any member of the production team or Society Committees wish to contact you they will do so through our Society email address unless you have given them your contact details and/or specific permission to contact you by other means.

**When you audition for a production** you are asked to complete an audition form that collects some of the following additional information:

- Your singing range
- Part you wish to audition for
- A photo of you
- Dates you can't make during the rehearsal period
- Any special talents or other information you wish to disclose that may be relevant to your audition/the production

Audition forms can change for each production to ensure that only necessary information relevant to the production and its rehearsals is collected. This

## Annex A – COS Privacy Policy

information is used by the membership secretary or secretary to organise the audition process and following auditions to create rehearsal registers, which include known absences. Your information is seen by the audition panel to help them identify auditionees and be better informed about your abilities, when you are/aren't available to rehearse and to know which parts you wish to be considered for. Following Auditions, your photo may be used by the production team to identify you as a cast member.

**In addition, as part of our audition forms and subsequently if and when you are cast in a show** we also collect **special category** personal information, such as:

- Health information
- Biometric information

### Health Information

We collect this by asking you to complete a medical & emergency contact form. This is used by the Society to help meet your physical/medical needs and to ensure your health, safety and well-being during rehearsals and productions. We can only act on the information we are given so it is important you inform us of anything that may affect you or we should know, to safeguard your health, safety and well-being whilst you are participating in a production and its rehearsals. This information is kept confidentially by our Membership secretary or an appointed individual as our Health & Safety representative at rehearsals and performances in place of the membership secretary, with restricted access to only those who need to know for the purpose of ensuring your health, safety and general well-being and/or to contact someone in case of an emergency (such as illness or injury). You will be informed who the appointed individual is if it is not the membership secretary.

The membership secretary or appointed Society Health & Safety representative create lists of those in a cast with allergies/medical conditions and their emergency contact details for ease of reference during the run of a production, for use by any appropriate/necessary professionals or backstage volunteers working on a production so they can be vigilant to all casts health, safety and well-being and someone can be contacted quickly in case of an emergency. They will not have access to full health and medical information, just a brief note (for example, allergy to nuts). Appointed First Aiders may be given access to health and medical information as necessary and appropriate to ensure individual's health, safety and wellbeing.

### Biometric Information

This information is collected by a member of the wardrobe department (part of the production team) for a production, who takes measurements (e.g. height, waist size, shoe size etc.) from you in order to get/make costumes that will fit you for the production. These are kept by the wardrobe team for this purpose only and are not shared with other cast members or members of the production team.

The above information, completed at auditions and when cast, is kept for the duration of a production (including its rehearsals) and up to 6 months afterwards, then it will be destroyed.

## Annex A – COS Privacy Policy

**For Equality Monitoring of our membership** we may also collect other **special category** personal information, with explicit consent such as:

- Ethnicity
- Gender/Sex details
- Sexual orientation
- Religion
- Disability

Occasionally (including when auditioning for a show) we may ask members to complete a form or survey disclosing details of their Ethnicity, gender/sex, age, marital status, sexual orientation, religion and disability details in order to ascertain the demographic makeup of the Society & its diversity for equality monitoring. This may be anonymously disclosed on a survey/form or disclosed on an identifiable survey/form. It is up to the individual as to whether they choose to complete the form or not. There is also an option to not disclose information on any of the categories mentioned above. This information is vital in evaluating our progress towards our Inclusion, Equality & Diversity aims (as detailed in our Inclusion, Equality & Diversity Policy, statement and Strategy).

Any identifiable special category equality monitoring data is collected, stored and processed by the membership secretary, secretary, Chair and/or Inclusion Lead. Information collected may be shared with members of the Executive Committee, CO2 and Marketing & Events committees as appropriate or applicable but anonymised wherever possible. Individuals special category equality monitoring data is kept for the duration of their membership. Anonymous reports of the Society membership demographic are created and may be shared with the wider membership, the public and outside organisations. Anonymous data will be stored on an ongoing basis as a matter of public record.

### **Additional information**

In addition to the above information we also ask cast and members to complete the following forms:

- Data protection agreement – this asks you for your consent for us to contact you, take photographs that include you at rehearsals/performances, include you in our show/concert programme, add you to our Facebook groups and any other consents appropriate/applicable to the specific production or to our under 16's. This form is processed and stored by our Membership secretary for the duration of a production (including its rehearsals) and up to 6 months afterwards, then it is destroyed. This consent can be withdrawn at any time with the exception of published programme information and published photos which become public record. For more information on photos and programmes please see our privacy notices for publishing programmes and processing & publishing photos.

We may use **google forms** to acquire the data mentioned above. Doing this electronically makes processing and collating the data easier and removes the need for paper copies. Data is exported and saved as spreadsheets and these are retained for each purpose as described above. You can read more about google privacy policies here: <https://policies.google.com/privacy>



## Annex A – COS Privacy Policy

### **Life members**

The Executive Committee have the power to award life membership to any Society member in recognition of their outstanding service to the Society over a long period of years. They are then members, without having to pay annual subscriptions for life. A list of our Society life members is included in each production programme and may be listed on our website. When you are bestowed the honour of being a life member of the Society, consent to be known and listed as such on our website and in programmes is assumed. If you are a life member and do not wish your name to be included in any future programmes or on our website you can contact us at [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

Please note that no personal information is stored or routinely available/accessed outside of the UK or the EEA, although our Mailchimp mailing lists are hosted by Mailchimp, who are based in the USA and Google maintain servers worldwide.

For information about your rights in relation to this use of your personal information please see our General privacy Notice - section 5 of our privacy policy.

# Annex B- COS Privacy Policy



## Processing Committee Data

For the Society to function we need members to hold positions on the Executive committee and other sub committees, such as the CO2 committee and the Marketing & Events committee.

The Society holds the following personal information about committee members:

- Names
- Contact details
- Digital images
- Position/Role Held
- Dates they have held the positions/roles from/to

We sometimes need to share some of this information with:

- Other committee members
- Colchester Operatic Society members
- Other organisations and individuals (as deemed appropriate/necessary)

The primary Data processor and controller is each committee Secretary/Assistant Secretary, who creates a contact list for all other committee members, in order to enable effective communication between all committee members, so the committee can function effectively.

The secondary Data processor and controller is our Webmaster, who publishes committee lists, using names, role and only public/official contact details where appropriate/applicable, on our website. This is so all our members and outside organisations wishing to work with us, know who is currently serving on our committees and how to contact them with any queries relevant to their position/role.

Digital images of our committee members are used to aid identification of committee members for our membership only and are shared in members' newsletters and on our website (Who's who/committee page). These photos are provided by the individual committee member themselves with informed consent. Committee members can opt out of sharing photos and can withdraw consent for their photo use at any time by contacting the assistant secretary (newsletter) or webmaster (website).

Current committee lists, containing names and roles only, are published in each of our production programmes, and once published become public record (for more information see the privacy notice in Annex D- publishing programmes). A photo of our Chair and/or CO2 Chair (as appropriate to the production) is also included in the programme. These are taken by a professional photographer, and as such remain their property, but are shared with us digitally, before publishing in the programme.

## Annex B- COS Privacy Policy

Only official Society email contact details are shared on our website. Contact details of individual committee members are only shared with outside organisations and/or individuals with that individual committee member's consent and for legitimate committee business on behalf of the Society. If organisations and/or individuals wish to contact individual committee members for any other reason, we can pass their contact details on to that committee member so they can choose to make contact with them or not, as they so wish.

The information we use will be retained for the above purposes until the committee member ceases to serve on any of our committees, with the exception of information published in any production programmes, which become public record.

No personal information is routinely available outside of the UK. However, where information is used in publications or on our website we cannot restrict the access to the UK.

For information about your rights in relation to this use of your personal information please see our General privacy Notice - section 5 of our privacy policy.

## Annex C- COS Privacy Policy



### Processing Data for Marketing Purposes

We sometimes use personal information for marketing purposes in order to promote our Society and its productions and events.

#### Marketing mailing list

We operate a marketing mailing list that individuals sign up to via our website or facebook page.

If you choose to sign up and enter your name and contact details, you agree to be sent information periodically about our Society and its productions and events via Mailchimp, a third party data controller. You can read more about how Mailchimp uses personal information here: <https://mailchimp.com/legal/privacy/>.

Access to our Mailchimp account is password protected. Our Marketing & Events Committee are the data controllers but our Membership secretary and Chair also have access to the account.

If you have signed up to our marketing mailing list you can unsubscribe at any time and each email offers you the option to unsubscribe at the bottom.

We do **not** sell or share our marketing mailing lists to other organisations or individuals.

#### Marketing to members

We send out quarterly members' newsletters to our members that contain advertisements for our productions and events and sometimes other local productions and events or advertisements from our members and affiliated associations (for example the Headgate Theatre, The Mercury Theatre and NODA).

These newsletters may include personal information about members such as

- Name
- Contact Details (only if necessary and with your consent to do so)
- Digital Images (taken with consent and/or from a publically published source)

This information is used for the purpose of sharing news with other members and/or the promotion of productions and events. We always have our members' health, safety and well-being in mind and would **not** share any information or news that put this at risk in any way. We will also **not** share any information or news that you have asked to remain confidential.

Newsletters are only published on the members' area of our website and shared to members via the Society's email or post. If we have published news you feel is

## Annex C- COS Privacy Policy

inaccurate or should not have been shared then please contact us via [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk) and we will remove the corresponding newsletters from our website and publish a retraction/apology in the next edition we send out.

If other organisations and/or individuals contact us wishing to share their marketing with our members, we would use our existing communication tools, including the members' newsletters, to disseminate the information but only if we felt the information was of interest/relevant to our members.

### **Marketing to past members**

Past members do not receive members' newsletters. We do, with your consent when you joined as a member, contact past members with information about the society, its productions and events for up to 20 years after they cease being members unless you withdraw consent for us to do so. This is done by our Membership Secretary via email or post or using Mailchimp by our Membership Secretary, Chair or Marketing and Events Committee.

### **Promoting our productions and events**

In order to promote our productions and events we may use the following personal information from cast:

- Name
- Age
- Digital Images

Consent is gained through our data protection agreements, signed when you are cast in a production (see Annex A, processing members data) or individually agreed for specific purposes (e.g. curtain call interview in the local paper).

If consent is withdrawn at any time, every effort will be made to delete the information, but please note that once photos and information are published publically (i.e. in the media, on Social media and in production programmes) they become public record. We may not be able to locate and delete the information on request, although reasonable steps will be taken to do so where and when possible. For further information please see our privacy notices in Annex D, publishing programmes and Annex E, processing & publishing photos.

The above information might be shared with:

- Social Media applications (e.g. Facebook, Twitter, Instagram)
- Local or National Newspapers
- Local, Regional or National Radio Stations
- Local, Regional or National TV Stations

No personal information is routinely available outside of the UK or the EEA although our Mailchimp mailing lists are hosted by Mailchimp, who are based in the USA. However, where information is used on social media, in publications, or on our website we cannot restrict the access to such images to the UK.

## Annex C- COS Privacy Policy

For information about your rights in relation to this use of your personal information please see our General privacy Notice - section 5 of our privacy policy.

## Annex D- COS Privacy Policy



### Publishing Programmes

We create a production programme for all our shows and concerts. This gives audience members the chance to see who is cast (and on stage) and who is involved backstage in our productions, as well as promote the Society and any future productions and events. It also provides income for the Society as we get companies and organisations to pay to advertise in our programmes and programmes are sold to audience members. Programmes are a great keepsake for audiences and cast & crew members. They also become a historical record of our Society productions, which we archive on our website:

<https://www.colchesteroperaticsociety.co.uk/programmes/>

Personal information used for programmes includes:

- Names
- Age (if applicable/appropriate)
- Role/title in production
- Digital Images
- Biographies

Consent is gained through our data protection agreements, signed when you are cast in a production (see Annex A, processing members data) and individually when images are taken and/or information is asked for.

Each production programme is the responsibility of an appropriate Designated person (**programme co-ordinator**) appointed by our Marketing & Events Committee. This person obtains, collates and processes the information necessary (with the relevant individuals consent) to produce an informative programme.

Cast of a production will usually have a headshot taken and included in a programme. Principal cast and the Creative Team (Director/Musical Director/Choreographer/Assistant Director) will usually have a biography included. Backstage crew will usually be listed by name and role only.

You will be asked to check the spelling of your name and that it is linked to the correct image and for any other biographical information needed by the programme co-ordinator, giving you control over what is published. If you wish audiences to know who you are and what you have done previously you will need to provide this information. You do not have to provide the information or consent for your name and/or image to be included but please note this means you will not appear in the production programme.

We often employ the services of professional photographers for our cast headshots and some rehearsal photos to be used in our programmes, giving us a better quality of image for this publication. In this instance the images remain the property of the professional photographer but are shared with our Marketing and Events Team and



## Annex D- COS Privacy Policy

programme co-ordinator. No other personal information is shared with the professional photographer. These photographs may also be used for promoting the production as well as in the production programmes. For further information please see our privacy notice in Annex E, processing & publishing photos.

Current committee lists, containing names and roles only, are published in each of our production programmes. A photo of our Chair and/or CO2 Chair (as appropriate to the production) is also included in the programme.

A list of our Society life members is included in each programme. When you are bestowed the honour of being a life member of the Society, consent to be known and listed as such on our website and in programmes is assumed. If you are a life member and do not wish your name to be included in any future programmes or on our website you can contact us at [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

The programme co-ordinator will be storing the information digitally on their personal computer as they edit and compile the programme. Once it is completed it is shared with a publishing company for printing.

Once published as a hard copy programme, copies are sold to audiences for that production and then given to cast and crew at the end of a production.

The Webmaster uploads the programmes onto the website after productions have finished, as a public historic record of our productions.

If consent is withdrawn at any time, every effort will be made to delete the information, but please note that once photos and information are published publically in production programmes they become public record. We may not be able to locate and delete the information on request, although reasonable steps will be taken to do so where and when possible.

No personal information is routinely available outside of the UK or EEA. However, where information is used in publications (which will include our programmes) or on our website we cannot restrict the access to such images to the UK.

For information about your rights in relation to this use of your personal information please see our General privacy Notice - section 5 of our privacy policy.

## Annex E – COS Privacy Policy



### Processing and Publishing Digital Images

We use photos of individuals for **identification purposes**.

These photos are provided by members/auditionees/cast members themselves (or their parents/legal guardians, if they are under 16 years old) and are kept for the duration of a production (including its rehearsals) and up to 6 months afterwards, then they will be destroyed.

The Data Controller is our membership secretary, who may share your photo (linked with your name) with:

- An audition panel
- The production team

These photos are not published anywhere but may be displayed for a brief time at a rehearsal/performance venue or in a production team's workspace, but only if necessary/appropriate to aid identification of individuals.

Digital images of our committee members are used to aid identification of committee members for our membership only and are shared in members' newsletters and on our website (Who's who/committee page). These photos are provided by the individual committee member themselves with informed consent. Committee members can opt out of sharing photos and can withdraw consent for their photo use at any time by contacting the assistant secretary (newsletter) or webmaster (website).

We sometimes wish to use digital images, e.g. photos, videos, audio recordings to promote our productions and events and to **aid the learning of choreography and harmonies** during the rehearsal process. Consent for this is asked via our data protection agreements and/or audition/production sign up forms (see privacy notice Annex A-processing membership data) and verbally at the time of taking any photos/videos or audio recordings. You may choose not to be included in the recordings/images at the time they are taken/recorded, even if you have given consent on the forms. You can withdraw consent officially after signing the consent forms by contacting our membership secretary on [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

Videos and audio recordings made for the purpose of learning choreography and/or harmonies are shared with fellow cast members either by email or on the production closed facebook group. All members of these closed facebook groups agree not to share these recordings publically for any other purpose via our social media agreement (signed when they join as Society members and/or as a cast member).

## Annex E – COS Privacy Policy

The cast member or production team member that took the recording is the Data Controller in this instance. The recordings are deleted from the device they were taken at any time after they are shared, and at latest 6 months after the production has finished.

You have the right to withdraw consent to these recordings being published on the closed Facebook group at any time and if you choose to do so, the Society will delete the recording from the group. We will also ask all individuals the recording was shared with to delete it but this cannot be guaranteed, especially if cast members are relying on the recording to help them learn their parts/moves. To withdraw consent please contact the individual in charge of taking and publishing the material. If you do not know who this is please contact our membership secretary on [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

### **Promotion of productions and events**

Consent for digital images to be taken and published for promotion of our productions and events is gained through our data protection agreements, signed when you are cast in a production (see Annex A, processing members data) or individually agreed for specific purposes (e.g. curtain call interview in the local paper). It is also asked for verbally at the time of taking any images or recordings. You can choose not to have your photo taken or not to appear in any promotional video/audio recordings at the time they are taken, even if you have signed a consent form.

Digital images for the purpose of promoting our productions and events are usually taken by a member of our Marketing and Events Team who will then act as Data Controllers.

We do also employ the services of professional photographers for our cast headshots and some rehearsal photos. In this instance the images remain the property of the professional photographer but are shared with our Marketing and Events Team. These photographs are used for promoting the production and in the production programmes (please see Annex D-publishing programmes for more information).

We may publish any images taken for promotional purposes on our Website and our Facebook Page. Our webmaster is Data Controller for these locations.

Images may be linked to names when published (this particularly happens in production programmes) but are often just published as images linked to the production and/or Society as a whole. If images are to be linked to any further information (such as a biography, interview etc.) your consent would be sought and you will be asked to provide the information yourself, giving you control over what is shared and published.

We may share digital images with your consent with:

- Social Media applications (e.g. Facebook, Twitter, Instagram)
- Local or National Newspapers

## Annex E – COS Privacy Policy

- Local, Regional or National Radio Stations
- Local, Regional or National TV Stations

If you withdraw consent at any time then every effort will be made to delete images of you, but please note that once photos and recordings are published publically (i.e. in the media, on Social media and in production programmes) they become public record. We may not be able to locate and delete the images on request, although reasonable steps will be taken to do so where and when possible.

To withdraw consent please contact the individual in charge of taking and publishing the material. If you do not know who this is please contact our membership secretary on [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

We may also use digital images of our members taken with consent or from an already published public source (such as Facebook) in our quarterly members' newsletters. This is for the purpose of sharing news with other members and/or the promotion of productions and events. Newsletters are only published on the members' area of our website and shared to members via the Society's email or post. For further information please see our privacy notice Annex C-Processing Data for marketing purposes.

No personal information is routinely available outside of the UK or the EEA. However, where information is used on social media, in publications, or on our website we cannot restrict the access to such images to the UK.

For information about your rights in relation to this use of your personal information please see our General privacy Notice - section 5 of our privacy policy.

## Annex F – COS Privacy Policy



### Processing Volunteer and Chaperone Data

We often have volunteers who support our Society with its productions and events. In particular, backstage volunteers during show performances, and Chaperones, appointed to safeguard the younger members of our Society (aged 16 years and under) during rehearsals and performances.

We are required to collect some information about them, provided by the individuals with consent, for example:

- Name and contact details
- Vetting information for Chaperones and volunteers working with children aged under 16 years and under as deemed appropriate
- Signature on any applicable consents, policies and agreement forms you need to be aware of and agree to abide by

In addition, we may ask to collect the following special category information:

- Health information (if applicable and with consent in order to safeguard the individual whilst they undertake duties)
- Ethnicity, Gender/sex, sexual orientation, religion and disability details

Our legal basis for collecting and using this information is consent, but where we collect vetting information this is on the basis of our Legal Obligation to safeguard children and young people. Where we are using your information with your consent you can withdraw your consent at any time by contacting the membership secretary on [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk) or the Safeguarding Lead in the case of chaperones on [safeguarding@colchesteroperaticsociety.co.uk](mailto:safeguarding@colchesteroperaticsociety.co.uk).

Vetting information for chaperones and any volunteers that we require to vet for safeguarding purposes, may be shared with Essex County Council (ECC), who support with processing DBS checks and issue chaperone licenses. We do not store any vetting information or documentation once a DBS check has been completed or it has been shared with ECC and they acknowledge receipt of the information. Information on how ECC use and store your data can be found here <https://www.essex.gov.uk/privacy-childrens>.

We will keep your contact information whilst you are volunteering for the Society and remain interested in volunteering in the future, which can be up to 20 years as deemed necessary or appropriate (as detailed in our retention schedule). We keep Health details collected and any production specific consents and agreements signed for the duration of the production they relate to and up to 6 months afterwards. Ongoing consents and agreements to policies, procedures and codes of conduct are kept for as long as you volunteer for the Society and up to 20 years after as deemed necessary or appropriate (as detailed in our retention schedule).

## Annex F – COS Privacy Policy

We use personal information to:

- keep you informed of upcoming productions, events and volunteer/chaperone opportunities relating to the Society
- Keep you informed of information relating to the production or event you are volunteering or chaperoning for, including details or your role and duties
- To apply for DBS checks and chaperone licenses for those volunteering to chaperone or working with children aged 16 years and under
- To ensure you are aware of all the relevant policies and procedures and codes of conduct that are applicable to your role. We ask individuals to sign all relevant agreements to state their understanding and compliance with them.

We do not share your contact details with other organisations or individuals unless you give us specific permission to do so. If any member of the production team or Society Committees wish to contact you they will do so through our Society email address unless you have given them your contact details and/or specific permission to contact you by other means.

### Health Information

We collect this by asking you to complete a medical & emergency contact form. This is used by the Society to help meet your physical/medical needs and to ensure your health, safety and well-being during rehearsals and productions. We can only act on the information we are given so it is important you inform us of anything that may affect you or we should know, to safeguard your health, safety and well-being whilst you are participating in a production and its rehearsals. This information is kept confidentially by our Membership secretary or an appointed individual as our Health & Safety representative at rehearsals and performances in place of the membership secretary, with restricted access to only those who need to know for the purpose of ensuring your health, safety and general well-being and/or to contact someone in case of an emergency (such as illness or injury). You will be informed who the appointed individual is if it is not the membership secretary.

The membership secretary or appointed Society Health & Safety representative may create lists of those volunteering with allergies/medical conditions and their emergency contact details for ease of reference during the run of a production, for use by any appropriate/necessary professionals, committee members or other volunteers working on a production so they can be vigilant to all crew, volunteers and chaperones health, safety and well-being and someone can be contacted quickly in case of an emergency. They will not have access to full health and medical information, just a brief note (for example, allergy to nuts). Appointed First Aiders may be given access to health and medical information as necessary and appropriate to ensure individual's health, safety and wellbeing.

**For Equality Monitoring** we may also collect other **special category** personal information, with explicit consent such as:

- Ethnicity
- Gender/Sex details
- Sexual orientation
- Religion

## Annex F – COS Privacy Policy

- Disability

Occasionally we may ask volunteers/chaperones to complete a form or survey disclosing details of their Ethnicity, gender/sex, age, marital status, sexual orientation, religion and disability details in order to ascertain the demographic makeup of the Society & it's diversity for equality monitoring. This may be anonymously disclosed on a survey/form or disclosed on an identifiable survey/form. It is up to the individual as to whether they choose to complete the form or not. There is also an option to not disclose information on any of the categories mentioned above. This information is vital in evaluating our progress towards our Inclusion, Equality & Diversity aims (as detailed in our Inclusion, Equality & Diversity Policy, statement and Strategy).

Any identifiable special category equality monitoring data is collected, stored and processed by the membership secretary, secretary, Chair and/or Inclusion Lead. Information collected may be shared with members of the Executive Committee, CO2 and Marketing & Events committees as appropriate or applicable but anonymised wherever possible. Individuals special category equality monitoring data is kept for the duration of their membership. Anonymous reports of the Society membership demographic are created and may be shared with the wider membership, the public and outside organisations. Anonymous data will be stored on an ongoing basis as a matter of public record.

We may use **google forms** to acquire the data mentioned above. Doing this electronically makes processing and collating the data easier and removes the need for paper copies. Data is exported and saved as spreadsheets and these are retained for each purpose as described above. You can read more about google privacy policies here: <https://policies.google.com/privacy>

No personal information is routinely available outside of the UK or the EEA, although Google maintain servers worldwide.

For information about your rights in relation to this use of your personal information please see section 5 of our overarching privacy notice.



## Annex G – COS Privacy Policy



### Processing Contracted Individuals' and Companies' Data

We contract individuals and/or companies for their services to support our productions, events and/or the management of our Society.

We are required to collect some information about them, provided by the individuals and/or companies with consent, for example:

- Name and contact details
- Vetting information/safeguarding checks if the individuals or employees of the company are working with children aged 16 years and under
- Signature on any contract or agreement

In addition, we may ask to collect the following special category information:

- Health information (if applicable and with consent in order to safeguard the individual whilst they undertake duties)
- Ethnicity, Gender/sex, sexual orientation, religion and disability details

Our legal basis for collecting and using this information is consent, but where we collect vetting information/safeguarding checks this is on the basis of our Legal Obligation to safeguard children and young people. Where we are using your information with your consent you can withdraw your consent at any time by contacting the membership secretary on [membership@colchesteroperaticsociety.co.uk](mailto:membership@colchesteroperaticsociety.co.uk).

Companies we contract are asked to complete safeguarding checks which include assurances that individuals they employ, who will be working with children aged 16 years and under in the Society, have been vetted in accordance with our legal obligations to safeguard children and young people. If Individuals working directly with children aged 16 years and under are not vetted we may complete vetting checks ourselves and ask individuals to provide vetting information for this purpose.

We will keep your contact information whilst you are working for/with the Society and remain interested in working with us in the future, which can be up to 20 years as deemed necessary or appropriate (as detailed in our retention schedule). We keep Health details collected and any production specific consents and agreements signed for the duration of the production they relate to and up to 6 months afterwards.

Contracts of hire/employment are kept for up to 7 years (as detailed in our retention schedule).

Safeguarding check agreements are kept for as long as the individual named is working for/with the Society but are reviewed annually (as detailed in our retention schedule).

Vetting information, if required, may be shared with Essex County Council (ECC), who sometimes process DBS checks on our behalf. We do not store any vetting



## Annex G – COS Privacy Policy

information or documentation required for DBS checks once DBS checks are complete or it has been shared with ECC and they acknowledge receipt of the information. Information on how ECC use and store your data can be found here <https://www.essex.gov.uk/privacy-childrens>

We use personal information to:

- To arrange and agree contracts of hire/employment
- Keep you informed of upcoming productions, events and technical/creative opportunities relating to the Society
- Keep you informed of information relating to the production or event you are working on, including details or your role and duties
- To ensure you are aware of all the relevant policies and procedures and codes of conduct that are applicable to your role. We may ask individuals to sign all relevant agreements to state their understanding and compliance with them.
- To ensure we are safeguarding children and young people in our membership and involved in any of our productions/events.
- To apply for DBS checks if deemed necessary or appropriate for individuals working with children aged 16 years or under

We do not share your contact details with other organisations or individuals unless you give us specific permission to do so. If any member of the production team or Society Committees wish to contact you they will do so through our Society email address unless you have given them your contact details and/or specific permission to contact you by other means.

### Health Information

We collect this by asking you to complete a medical & emergency contact form. This is used by the Society to help meet your physical/medical needs and to ensure your health, safety and well-being during rehearsals and productions. We can only act on the information we are given so it is important you inform us of anything that may affect you or we should know, to safeguard your health, safety and well-being whilst you are participating in a production and its rehearsals. This information is kept confidentially by our Membership secretary or an appointed individual as our Health & Safety representative at rehearsals and performances in place of the membership secretary, with restricted access to only those who need to know for the purpose of ensuring your health, safety and general well-being and/or to contact someone in case of an emergency (such as illness or injury). You will be informed who the appointed individual is if it is not the membership secretary.

The membership secretary or appointed Society Health & Safety representative may create lists of those working for/with the Society with allergies/medical conditions and their emergency contact details for ease of reference during the run of a production, for use by any appropriate/necessary professionals, committee members or other volunteers working on a production so they can be vigilant to all crew, volunteers and chaperones health, safety and well-being and someone can be contacted quickly in case of an emergency. They will not have access to full health and medical information, just a brief note (for example, allergy to nuts). Appointed First Aiders

## Annex G – COS Privacy Policy

may be given access to health and medical information as necessary and appropriate to ensure individual's health, safety and wellbeing.

**For Equality Monitoring** we may also collect other **special category** personal information, with explicit consent such as:

- Ethnicity
- Gender/Sex details
- Sexual orientation
- Religion
- Disability

Occasionally we may ask individuals who are contracted to work for/with us to complete a form or survey disclosing details of their Ethnicity, gender/sex, age, marital status, sexual orientation, religion and disability details in order to ascertain the demographic & diversity of those we work with for equality monitoring. This may be anonymously disclosed on a survey/form or disclosed on an identifiable survey/form. It is up to the individual as to whether they choose to complete the form or not. There is also an option to not disclose information on any of the categories mentioned above. This information is vital in evaluating our progress towards our Inclusion, Equality & Diversity aims (as detailed in our Inclusion, Equality & Diversity Policy, statement and Strategy).

Any identifiable special category equality monitoring data is collected, stored and processed by the membership secretary, secretary, Chair and/or Inclusion Lead. Information collected may be shared with members of the Executive Committee, CO2 and Marketing & Events committees as appropriate or applicable but anonymised wherever possible. Individuals special category equality monitoring data is kept for the duration of the time they work for/with us. Anonymous reports are created and may be shared with the wider membership, the public and outside organisations. Anonymous data will be stored on an ongoing basis as a matter of public record.

We may use **google forms** to acquire the data mentioned above. Doing this electronically makes processing and collating the data easier and removes the need for paper copies. Data is exported and saved as spreadsheets and these are retained for each purpose as described above. You can read more about google privacy policies here: <https://policies.google.com/privacy>

No personal information is routinely available outside of the UK or the EEA, although Google maintain servers worldwide.

For information about your rights in relation to this use of your personal information please see section 5 of our overarching privacy notice.