



DATA PROTECTION POLICY

This document is a statement of the Data Protection Policy adopted by Hitchin Symphony Orchestra.

Hitchin Symphony Orchestra (HSO) needs to collect and use certain types of information about its amateur players, Tutors, Patrons, and members of the public who wish to be on its mailing list. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations. This personal information must be dealt with properly, however it is collected, recorded and used – whether on paper, on a computer, or recorded on other material – and there are safeguards to ensure this in the Data Protection Act 1998, as well as the General Data Protection Regulations (GDPR) 2018.

We regard the lawful and correct treatment of personal information as very important to successful operations, and to maintaining confidence between those with whom we deal and ourselves. We ensure that our organisation treats personal information lawfully and correctly.

To this end, we fully endorse and adhere to the Principles of Data Protection, as detailed in the above-mentioned legislation.

Specifically, the Principles require that personal information shall:

- 1) be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- 2) be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- 3) be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- 4) be accurate and, where necessary, kept up to date;
- 5) not be kept for longer than is necessary for that purpose or those purposes;
- 6) be processed in accordance with the rights of data subjects under the Act and under the GDPR;
- 7) be protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures;
- 8) not be passed on to third parties, without having first gained the individual's specific consent for this to happen, in each case;
- 9) not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

HSO will, through appropriate management, strict application of criteria and controls:

- observe fully, conditions regarding the fair collection and use of information;
- meet its legal obligations to specify the purposes for which information is used;
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- ensure the quality of information used;
- apply strict checks to determine the length of time information is held;
- ensure that the rights of people about whom information is held can be fully exercised under the Act and under the GDPR. (These include the right: to be informed that processing is being undertaken, of access to one's personal information, to prevent processing in certain circumstances and to correct, rectify, block or erase information which is regarded as wrong information);
- take appropriate technical and organisational security measures to safeguard personal information;
- ensure that personal information is not transferred abroad without suitable safeguards;
- treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.

In addition, we will ensure that:

- there is someone with specific responsibility for Data Protection within HSO;
- everyone managing and handling personal information understands they are responsible for following good data protection practice;
- everyone managing and handling personal information is appropriately monitored;
- queries about handling personal information are promptly and courteously dealt with;
- methods of handling personal information are clearly described;
- a regular review is made of the way personal information is held, managed and used;
- performance with handling personal information is regularly assessed and evaluated;
- a breach of the rules and procedures identified in this policy will lead to corrective action being taken.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the law on Data Protection.

In case of any queries or questions in relation to this policy please contact HSO via the website: www.hitchinsymphony.org.uk