

FIFE YOUTH JAZZ ORCHESTRA

Scottish Charity Number SC039815 (“**FYJO**”)

Data Protection Policy

For the purposes of Regulation (EU) 2016/679, General Data Protection Regulation, ("GDPR"), the Data Protection Act 2018 and any other applicable UK data protection laws in force from time to time, the data controller is the charity known as the Fife Youth Jazz Orchestra ("FYJO"), Scottish Charity Number SC039815 and having its registered address at 10 George Govan Road, Cupar, Fife, KY15 4GY.

About this document

This privacy policy sets out the way FYJO processes personal data and how that is communicated to those from whom personal data is collected.

How FYJO collects information

FYJO may collect personal data in a few limited ways, namely:

- Directly from individuals (including parents/guardians) when they fill in an application form, when enquiries are made to FYJO, howsoever made, or when individuals otherwise interact with FYJO including its Committee, Trustees, employees or appointees.

The types of information we collect

We may collect the following types of personal data (as defined by the GDPR and Data Protection Act 2018):

- Contact details including email address(es), telephone numbers and postal address(es);
- Financial information;
- Other information volunteered in connection with FYJO activities, as detailed in the following section;
- Information relating to anyone providing services to FYJO, including on a paid for or voluntary basis.

FYJO may also collect data about health or medical conditions from those it is in contact with, for example for the purposes of knowing if there is particular medication an individual might require or a health concern or child protection issue of which the charity trustees, musical director or tutor(s) should be aware.

How we use personal data

Personal data provided to FYJO will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences expressed by individuals.

More generally, FYJO will use personal data for the following purposes:

- Administration of Players' and/or Members' engagement with FYJO including:
 - Information about practices, gigs or other events, including but not limited to communication about transportation or other arrangements;

- Taking payment of fees;
 - Facilitating online practices or meetings;
 - Where appropriate, collecting information relating to child protection matters;
 - For the purposes of refusing or granting permission for recording and/or use of images for FYJO publicity; and
 - Proof of parental awareness of the Zoom code of conduct used for the purposes of online practices, performances or meetings of FYJO.
- Other communications about FYJO activities;
 - Promotion of FYJO and its events, including ticket sales;
 - For the performance of contracts;
 - For the administration of FYJO, including any paid or voluntary roles; and
 - Research and statistical analysis about who is engaging with FYJO.

The legitimate purposes for which FYJO uses any personal data will always be properly considered.

Legal Basis for processing of personal data

FYJO bases its use and processing of personal data on GDPR Articles: 6(1)(a) for the purpose of recording consent provided on behalf of a person under the age of 18; 6(1)(b) for the purposes of facilitating contracts; 6(1)(c) where FYJO is under a legal obligation to process information, for example with regard to charitable donations for gift aid purposes, 6(1)(f), the legitimate interests of FYJO as a charitable organisation and GDPR Article 9(2)(d).

Marketing/Communication preferences

So far as possible, FYJO will always respect individuals' wishes in respect of what type of communications they wish to receive and how they want to receive them. However there are some communications that FYJO will need to issue, regardless of preferences, in order to fulfil its obligations to Players and/or Members. Non-exhaustive examples of these essential communications are:

- Records of transactions, such as payment receipts or Direct Debit confirmations (as applicable).
- FYJO mailings relating to renewals, outstanding sums due and notices of formal meetings.
- Information concerning practices and performances.

Individuals are in control of how FYJO communicates with them. Communication preferences and/or contact details can be updated by individuals contacting the FYJO Committee at:

Email: secretary@fyjo.org.uk.

Sharing information with others

FYJO does not sell to, or share personal data with, other organisations other than as set out below.

Personal data collected and processed by FYJO may be shared with FYJO employees and volunteers for the purposes of administering FYJO activities.

Where necessary and in line with individuals' reasonable expectations, with FYJO contractors and/or suppliers, including tutors and any provider of membership management services.

How long information is retained

FYJO retains personal data only for as long as necessary for the purpose for which it is used. For most Players' or Members' data, this means FYJO retains it for so long they have a valid FYJO membership plus 12 months from that membership ending and, for the purposes of financial records, for a period of up to seven years after an individual's last financial interaction with us (for accounting, tax reporting and record-keeping purposes).

Rights

Under data protection law, individuals have the right to:

- Request access to their personal data (commonly known as a "subject access request"). This enables individuals to receive a copy of the personal data FYJO holds about them and to check that FYJO is lawfully processing it.
- Request correction of the personal data that FYJO holds about them. This enables them to have any incomplete or inaccurate information FYJO holds to be corrected.
- Request erasure of personal data. Individuals may ask FYJO to delete or remove personal data where there is no good reason for it to be processed. Individuals also have the right to ask FYJO to delete or remove personal data where they have exercised their right to object to processing.
- Object to processing of personal data where FYJO is relying on a legitimate interest (or those of a third party) and there is something about an individual's particular situation which makes them want to object to processing on this ground. Individuals also have the right to object where FYJO is processing their personal data for direct marketing purposes.
- Individuals may request the restriction of processing of their personal data. This enables individuals to ask FYJO to suspend the processing of personal data about them. Individuals can also withdraw consent where this is the basis for FYJO processing their data (without affecting the lawfulness of the previous processing based on consent).
- Individuals may also request the transfer of their personal data to another party.

Please note that the above rights are not absolute and FYJO may be entitled to refuse requests where exceptions apply.

Contact and complaints

Any queries about this privacy policy or how FYJO processes personal data, or if an individual wishes to exercise any legal rights, you may contact the FYJO Secretary by email at: secretary@fyjo.org.uk.

If an individual is not satisfied with how FYJO is processing personal data, they can make a complaint to the Information Commissioner. Detailed information about rights under data protection laws is available from the Information Commissioner's Office website: www.ico.org.uk.