



# Bradford Organists' Association

Herein referred to as BOA

## - Website Privacy Policy -

### 1. Objectives & Aims

- This Privacy Policy relates to:

The processing, storage and security of any personal information that you choose to send to us from our Contact Us form.

Being compliant with the General Data Protection Requirements ("GDPR"), by providing you with an understanding about important areas of the GDPR.

The serving to you of 3<sup>rd</sup> Party cookies and analytics, as you interact with our website.

### 2. Your Personal Data – What is it?

- "Personal data" is any information about a living individual which allows them to be identified from that data (for example: name, email address, telephone number, residential address, photographs). Identification can be directly from the data itself, or by combining it with other information which, taken together, might then identify a living individual. It also refers to data that in itself cannot identify an individual but may do so if combined with other partial data from elsewhere.
- The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the "GDPR"), and other legislation relating to personal data and rights such as the Human Rights Act.

### 3. Data Controllers that BOA Work With?

- BOA is the sole Data Controller. We do not share your personal data with any 3<sup>rd</sup> parties, without your prior consent.

### 4. Data Processors that BOA Work With?

- We use Google Forms to serve our Contact form to you, and Google Drive (Cloud storage) to securely store any information that you enter in to the Contact Us form.
- We use Google Analytics to help us understand the performance of our website, and to help us to understand how you interact with our pages and content.

### 5. What personal data may be collected or processed?

- Title, Names, Contact details such as telephone number, address, email address;
- Any information that you choose to supply in the 'Message' section of the contact form, which may be considered personal information;
- Anonymous Information recorded by website cookies or similar technologies (incl. in-app codes, and whether session or persistent) e.g., Authentication or navigation, functionality and remember preference settings, performance & analytics including browser behaviour which Google may subsequently use to enhance your browsing experience away from our website. On first visit to our website, we offer you the choice to control the type of cookies placed in your browser's internet cache. Some cookies are considered essential for the basic operation of our website, and the quality of experience that it provides to you.
- You can view our Cookie Policy by following this link: [view our Cookie Policy](#)

## **6. BOA will comply with data protection law**

This states that personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Processed relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and then securely destroyed, including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure.

## **7. We use your personal data for some or all of the following purposes to:**

- Deliver information to you from our website pages, based on your navigation of the site;
- Contact you by post, email, telephone or by the use of social media
- Help us to build up a picture of how we are performing;
- Maintain our own records;
- Seek your views, opinions, comments, or enquiries;
- Notify you of changes to our facilities, services, or events that we think you may be interested to know;

## **8. What are the legal bases for processing your personal data?**

- The BOA is a registered Charity and has certain statutory obligations and duties.
- Your personal data may be processed under the legal bases of Legitimate Interests, Consent or Contractual Obligation.
- This Privacy Policy sets out your rights and BOA's obligations to you.

## **9. Sharing your personal data**

- BOA will implement appropriate security measures to protect your personal data.
- The information that you supply on the Contact Form will only be shared (where it is clearly necessary to do so) with the following:
  - Where/if we may be obligated to do so for legal reasons or public duty
  - (See 3) Data Controllers shown under the heading "Data Controllers That BOA Work With?"
  - (See 4) Data Processors shown under the heading "Data Processors that BOA Work With?"

## **10. How long do we keep your personal data?**

- BOA will only keep your information for as long as it is necessary for the purposes for which it was supplied. We will keep some records permanently if we were legally required to do so. We may keep some other records for an extended period of time.
- We may have legal obligations to retain some data in connection with any contracts that we enter in to, or to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some

personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim.

- In general, we will endeavour to keep data only for as long as we need it and are legally entitled to do so. This means that we will delete/dispose of it, whether in paper or electronic/digital form, once it is no longer required.

## **11. Your rights and your personal data**

When exercising any of the rights that you have been granted by the GDPR, listed below, and in order to process your message/request, we may need to verify your identity for your own security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

You have the following rights with respect to your personal data:

### **1. *The right to access personal data we hold about you***

- At any point you can contact us in writing to request the personal data we hold about you, as well as why we have that personal data, who has access to the personal data, and where we obtained the personal data from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same personal data, or requests which are manifestly unfounded or excessive, may be subject to an administrative fee, or our refusal.

### **2. *The right to correct and update the personal data we hold on you***

- If the data you think we hold about you is out of date, incomplete or incorrect, you can inform us and your data will be updated if we still hold it.

### **3. *The right to have your personal data erased***

- If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
- When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it to comply with a legal obligation or public duty).

### **4. *The right to object to processing of your personal data or to restrict it to certain purposes only***

- You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply, or if we have a legal obligation to continue to process your data.

### **5. *The right to data portability***

- You have the right to request that we transfer some/all of your personal data to another Data Controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

### **6. *The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained***

- You can withdraw your consent easily by telephone, email, or post (see contact information for BOA shown below). If you joined our email list you can unsubscribe by using the link on the email that we send to you.

## **7. The right to lodge a complaint with the Information Commissioner's Office.**

- You can contact the Information Commissioners Office via telephone 0303 123 1113, or email at [ICO.org.uk](mailto:ICO.org.uk), or by post to The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## **12. Transfer of Data Abroad**

- Any personal data transferred to countries or territories outside of the UK or European Economic Area (“EEA”), will only be placed on systems complying with measures giving equivalent protection of personal rights, either through international agreements, or contracts approved by the UK authorities.

## **13. Further Processing Not Covered by This Policy**

- If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing any processing, and will set out the relevant purposes and processing conditions.
- Where and whenever necessary, such that other legal bases do not apply, we will seek your prior consent to the new processing.

## **14. Information & Cyber Security**

- Information & Cyber Security is a legal principal concerned with every aspect of processing personal data, and not just storage or transmission. The Data Protection Act says: “Appropriate technical and organisational measures” shall be taken against unauthorised or unlawful processing of personal data, and against accidental loss, or destruction of, or damage to, that personal data. Organisations should have appropriate security to prevent the personal data held being accidentally or deliberately compromised”
- In particular BOA will ensure that it will:
  - Design and organise security measures to fit the nature of the personal data held, and the harm that may result from a security breach to that data;
  - Be clear about who has responsibility within BOA for ensuring information security;
  - Have in place the right physical and technical security;
  - Be ready to respond swiftly and effectively to any breach of data security.
  - Allow only authorised people to access, alter, disclose or destroy personal data;
  - Ensure that if personal data is accidentally lost, altered or destroyed, that it can be recovered from a secure back-up
  - Have in place security which takes account of the nature of the data, the risks involved in the way it is processed, and the harm and distress that might result from its improper use
  - Management & Organisational:  
Setting & changing authority for access to data on those devices which process that data.
  - Physical (Paper):  
Printed personal information is kept under lock and key and away from hazards.
  - Technological:  
IT/Computer/Network security is to be appropriate to the size and complexity of the processing, and BOA is entitled to balance disproportionate costs against the level of solutions.

As a minimum, BOA will ensure that its systems/equipment are protected by User Names & GDPR compliant Passwords, a Firewall or other such software, Network Security for both Wi-fi and Telecoms, and proprietary Anti-Virus software, awareness of the risks of processing personal data over public networks, and email communication is via secure encrypted transport.

## 15. Contact Details & Complaints

- Where information is collected from our website, and any associated email system:  
the website address is: [bradfordorganists.org.uk](http://bradfordorganists.org.uk)  
the email address is: [scott.sheila@btopenworld.com](mailto:scott.sheila@btopenworld.com)
- For questions relating to this Privacy Policy, you should contact  
email - [scott.sheila@btopenworld.com](mailto:scott.sheila@btopenworld.com) t: 01756 792136 m: 07484 118584
- Alternatively, you have the right to lodge a complaint with the Information Commissioners Office (ICO) via telephone 0303 123 1113 or email [ICO.org.uk](http://ICO.org.uk) or by post to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## 16. Changes to this Privacy Policy

We keep this Policy under regular review and will always display the latest policy on our website.