



YORKSHIRE SOUND WOMEN NETWORK C.I.C.

Data Management Policy

1. Context and overview

Introduction:

Yorkshire Sound Women Network C.I.C. (hereafter YSWN) needs to gather and use certain information about individuals.

These can include participants, network members, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

Why this policy exists:

This data management policy ensures YSWN:

- Complies with data protection law and follows good practice
- Protects the rights of customers, staff and partners
- Is transparent about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law:

The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. It requires personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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 or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;
5. 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 GDPR in order to safeguard the rights and freedoms of individuals;

6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
7. The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

2. People and responsibilities

Everyone at YSWN contributes to compliance with GDPR. Directors and Associates must understand the requirements and accountability of the organisation sufficiently to prioritise and support the implementation of compliance.

Key areas of responsibility are detailed below:

Data Protection Officer (DPO) – the person responsible for fulfilling the tasks of the DPO in respect of YSWN is Abi Bliss, Director. The minimum tasks of the DPO are:

- To inform and advise YSWN all who work on behalf of YSWN about their obligations to comply with the GDPR and other data protection laws
- To monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits
- To be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc)

The DPO, with support from YSWN Directors and Associates, is also responsible for:

- Keeping company Directors updated about data protection issues, risks and responsibilities
- Documenting, maintaining and developing the organisation's data protection policy and related procedures, in line with agreed schedule
- Embedding ongoing privacy measures into policies and day-to-day activities throughout the organisation. The policies themselves will stand as proof of compliance.
- Dissemination of policy across the organisation, and arranging training and advice for Directors, associates and musicians.
- Dealing with subject access requests, deletion requests and queries from clients, stakeholders and data subjects about data protection related matters
- Checking and approving contracts or agreements with third parties that may handle the company's sensitive data
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Performing regular checks and scans to ensure security hardware and software is functioning properly
- Evaluating any third party services the company is considering using to store or process data, to ensure their compliance with obligations under the regulations
- Developing privacy notices to reflect lawful basis for fair processing, ensuring that intended uses are clearly articulated, and that data subjects understand how they can give or withdraw consent, or else otherwise exercise their rights in relation to the companies use of their data

- Ensuring that audience development, marketing, fundraising and all other initiatives involving processing personal information and/or contacting individuals abide by the GDPR principles

YSWN Directors and Associates can contribute to YSWN's compliance with data protection law by following these guidelines:

E-mails

- When sending e-mails to multiple addressees, keep the mailing list private by typing the e-mail addresses in the BCC field, unless you are certain that the recipients have given consent for their e-mail addresses to be shared with that particular group.
- Do not send sensitive data via e-mail, unless it is unavoidable.
- Delete any e-mails containing sensitive data once the data has been transferred to the relevant database.

Devices

- Keep laptops secure, and do not leave unattended in any public areas.
- Ensure any device and cloud storage account passwords are strong and unique to each device.
- If you are a self-employed worker and need to access the YSWN cloud storage using your own device, ensure that the device is password protected, and that data is not duplicated onto your device. Self-employed workers will be given limited access only to data that is necessary to their work with YSWN.
- Ensure anti-virus software is installed on all devices and kept up-to-date.
- Ensure software and operating system updates are installed at the earliest opportunity.
- Keep devices locked when unattended.

Contact lists

- Regularly review and update contact records and delete any for which there is no longer a legitimate reason for them to be kept.
- If you are given somebody's personal details, add them immediately to the appropriate contact database: Insightly for professional contacts; Mailchimp for Network members. Delete the data from any other location.
- If you notice that any data held is incorrect or out-of-date, immediately update or remove the data.
- If you need to store personal data in one place for an event or project, for example in keeping an attendee list with contact details, ensure that the list is not duplicated. Delete the list from the cloud storage as soon as it is no longer in use.
- Do not create unnecessary duplicates of data lists. An individual's data should ideally only be stored in one place.

Collecting data

- If you are collecting personal data from any individual, ensure the YSWN privacy notice is visible to the data subject within the paper or online form. The privacy notice should explain: who we are; what data is being collected; why the data is being collected; how the data will be used; how the subject can exercise their rights. Ensure that the individual has the opportunity to give their consent for YSWN to contact them using the data they provide.

3. Scope of personal information to be processed

YSWN processes the following personal data:

- names of individuals
- email addresses
- postcode
- phone number
- date of birth
- gender
- ethnicity
- emergency contact information
- and if required by the funder: information about barriers to learning, information about disabilities, medical information, attendance information, information about progress and achievements.

YSWN collects the information directly from the data subject, through YSWN sign-up forms; ticket order forms; project registration forms; job application forms. YSWN also holds data relating to professional contacts which is publicly available or has been given to YSWN. Personal data will be stored on YSWN's online password protected CRM (Insightly); in online accounts for Mailchimp and Eventbrite, only for the purposes of sending e-mails and taking event ticket payment and bookings, respectively; on staff computers, accessed via a shared Dropbox folder, and only for the duration of the management of events and projects; and in certain circumstances in hard copy format, kept in a secure place.

YSWN will ensure that the data it holds is accurate by holding data only in the locations necessary as described above, and assigning one master database as a shared address book. The master database will be held using online CRM Insightly, and collected data will be transferred to it at the earliest opportunity, and at least on a monthly basis. YSWN will ensure that the data it holds is relevant to the purpose, not excessive, and is up-to-date, by reviewing the master database against any new data collected regularly. YSWN will ensure that the data is only held for the duration necessary to carry out the purpose and not kept for longer than is necessary.

4. Uses and conditions for processing

Outcome/Use	Processing required	Data to be processed	Conditions for processing	Evidence for lawful basis
<i>YSWN E-bulletins and direct emails</i>	<i>Mailing list held with Mailchimp, emails sent via Mailchimp</i>	<i>Name and email address</i>	<i>Consent</i>	<i>Evidence of date consent given held by Mailchimp (using GDPR form), permitting email contact</i>
<i>Monitoring and Evaluation</i>	<i>Migration of Eventbrite & Mailchimp data to Insightly to track engagement of YSWN members in events/workshops/affiliate groups</i>	<i>Name and email address</i>	<i>Consent</i>	<i>Evidence of date consent given held by Eventbrite, permitting use of data for monitoring</i>

				<i>& evaluation purposes</i>
<i>Other uses to be updated when policy is reviewed annually</i>				

This table will be updated as and when new uses and conditions for processing data arise.

The 6 lawful bases for processing:

- **Consent** of the data subject
- **Contract** – necessary for the performance of a contract with the data subject
- **Legal obligation** – necessary for compliance with a legal obligation
- **Vital interests** – necessary to protect the vital interests of a data subject or another person
- **Public task** – necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller
- **Legitimate interests** – of the data controller, except where such interests are overridden by the interests, rights or freedoms of the data subject

The two bases most likely to be used by YSWN for processing:

i. Consent

- freely and unambiguously given for specific purposes; ‘granular’;
- evidence of an affirmative action by the data subject to have indicated consent
- evidence that the data subject can reasonably understand:
 - who is using their personal information
 - what information and for what purpose
 - which communication channels
- audit trail demonstrates how and when consent obtained (and can be matched with privacy notice in use at the time)
- simple process for withdrawing consent (unsubscribe) with each communication
- **‘Soft opt-in’**
 - record of notification statement provided at time of soft opt-in detailing intended use of personal information, including:
 - opportunity to opt out
 - who is using their personal information
 - what information and for what purpose
 - which communication channels
 - simple process for withdrawing consent (unsubscribe) with each communication

ii. Legitimate interest

- evidence of process by which the rights and freedoms of the individual have been weighed against the interests of YSWN:
 - how the individual has been informed of this processing
 - what information the individual has been given to help them exercise their rights
 - how any negative outcomes can be mitigated

5. Privacy Impact Assessments (PIAs)

PIAs undertaken by YSWN will be detailed here. The DPIA will contain:

- A description of the processing operations and the purposes, including, where applicable, the legitimate interests pursued by the controller.
- An assessment of the necessity and proportionality of the processing in relation to the purpose.
- An assessment of the risks to individuals.
- The measures in place to address risk, including security and to demonstrate that you comply.
- A DPIA can address more than one project.

Further information about the circumstances under which organisations must conduct PIAs can be found at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>.

6. Data Sharing

YSWN sometimes shares personal data with certain third-party organisations. Any organisation which processes data on behalf of YSWN is also subject to compliance with GDPR as a Data Processor. YSWN will ensure that any third party data processor is able to sufficiently demonstrate its data security and compliance with GDPR.

Insightly

YSWN stores and processes personal data using the online CRM platform Insightly. The system allows YSWN to store personal information about individuals in one place. Types of data held by Insightly on behalf of YSWN will include names, job titles, e-mail addresses, telephone numbers, business postal addresses. Insightly's privacy policy can be found at: <https://www.insightly.com/privacy-policy/>

Mailchimp

YSWN stores and processes personal data using Mailchimp in order to distribute e-bulletins, and event invitations. Mailchimp acts as the data processor, and only authorised Mailchimp employees have access to YSWN's distribution lists. Usually, individuals sign up to YSWN's Mailchimp lists, at which point they give their consent for Mailchimp and YSWN to process their data for the purposes described at the time. Individuals are given the opportunity with every communication they receive via Mailchimp to view and update the data held about them, and to unsubscribe from the list. Mailchimp's privacy policy can be found at: <https://mailchimp.com/legal/privacy/>

Eventbrite

YSWN stores and processes personal data using Eventbrite in order to take bookings and payment (where applicable) for YSWN events. Eventbrite, as the data processor, will process personal data to help administer the event on behalf of YSWN (for example, sending confirmation, promotional and feedback emails, processing payments, etc.) and to help YSWN target, and understand the success of, their event and event planning (for example, providing event reports, using analytics to gain insights into the effectiveness of various sales channels, etc). Eventbrite's privacy policy can be found at: <https://www.eventbrite.com/privacypolicy/>

Survey Monkey

YSWN stores and processes personal data using SurveyMonkey in order to undertake consultation and invite feedback relating to YSWN activities and events. Survey Monkey, as the data processor, will process personal data to help administer questionnaires on behalf of YSWN. Survey Monkey's privacy policy can be found at: <https://www.surveymonkey.com/mp/legal/privacy-policy/>.

Funders

YSWN shares information with its funders, including Arts Council England and trusts/foundations, for monitoring and evaluation purposes.

YSWN collects data from participants when they join or enrol, which may include personal data: name, email, address, postcode, phone number, date of birth, gender, ethnicity, and if required by the funder, may include information about barriers to learning, information about disabilities, emergency contact information, medical information, attendance information, information about progress and achievements. Where personal information about an individual is shared with funders, such as their name, age, and other demographic information, consent shall be obtained from the individual or the person responsible for that individual prior to the information being shared.

This data is held securely and can only be accessed by members of the YSWN team for whom it is relevant and necessary for them to do their job.

We will only ask for information that is required:

- for reporting purposes by the funder or funders of the project, and our reports don't include any personally identifiable information.
- for YSWN to meet our duty of care and deliver our projects safely and to the highest standard.
- to notify participants of other useful opportunities via email communication

By signing up as participants, participants agree to be contacted about opportunities and your contact information will be added to our mailing list. This enables YSWN to inform them of changes or information about the project and future projects that may be of interest to them. Participants can unsubscribe from emails anytime by clicking the Unsubscribe button at the bottom of emails.

Social Media

For the purposes of evaluation and marketing, YSWN may document its work by taking photographs or videos of participants engaging in YSWN activities. These are sometimes shared with social media platforms including Facebook, Instagram, Twitter and Youtube. When working with children and vulnerable adults, permission will always be obtained in writing from those responsible for the participants before any photographs or videos are taken, including consent to share content on social media platforms. Where permission is refused for a particular child to be photographed, care is taken to ensure that that child is not photographed.

Disclosing data for other reasons

Under certain circumstances YSWN may be required to disclose personal data to law enforcement agencies without the consent of the data subject. YSWN will ensure the request is legitimate and will seek legal advice where necessary.

7. Security measures

YSWN ensures that the personal data it stores is protected from a data security breach. The following measures are in place to protect data from breach.

- Digital data is held and accessed on several desktop computers and laptops – each of which is password protected.
- Laptops are kept securely by YSWN Directors and Associates staff and are not left unattended in any public areas.

- Data is stored using online and cloud software accessed only by YSWN staff and protected by login and password details.
- Device and cloud storage account passwords are strong and unique to each device.
- Dropbox, the cloud software used by YSWN, employs a data back-up system which saves a history of all deleted and previous versions of files, and allows users to restore them for up to 30 days.
- Notifications from Dropbox alert the account holder to any unusual activity in the account, such as a log-in from an unknown device.
- Only YSWN staff have access to the YSWN devices. When a self-employed worker needs to access the YSWN cloud storage using their own device, they ensure that the device is password protected, and that data is not duplicated onto their device. Self-employed workers are given limited access only to data that is necessary to their work with YSWN.
- Anti-virus software is installed on all devices and kept up-to-date.
- Software and operating system updates are installed at the earliest opportunity.
- Any hard copy data is held in secured filing cabinets in RS 1/23, University of Huddersfield. Hard copy data which is no longer required is shredded.
- Hard copy documents containing personal data are not left in view out of hours or taken off-site unless they relate to and are required at a specific event.
- Personal and sensitive data is not sent via e-mail unless unavoidable.

8. Automated processing

YSWN does not use automated processing or decision making, nor any profiling of individuals.

9. Subject access requests

All individuals who are the subject of data held by YSWN are entitled to:

- Ask what information YSWN holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations

In all marketing communications individuals are notified of the process for updating the details YSWN holds about them, or to unsubscribe from further communications. Individuals are also notified at the point of submitting data to YSWN that they may withdraw their consent for YSWN to process their data at any time, by contacting YSWN directly on info@yorkshiresoundwomen.com.

In the case of a subject access request, YSWN will ensure that the identity of the individual is verified, before providing all the data held by YSWN to the individual as soon as possible, and within 30 days.

10. The right to be forgotten

Data subjects may exercise their right to be forgotten by requesting that YSWN remove all personal data relating to the individual from YSWN's databases and data storage. In the case that an individual requests this, YSWN will take all reasonable steps to remove or anonymise the data held about the individual. Data is held by YSWN in a limited number of locations. Third party data processors Insightly, Mailchimp and Eventbrite include tools for searching for and removing data about individuals. Only limited data are held on YSWN's cloud storage, but a digital search for data about the individual will be conducted to ensure

nothing remains on the system. Hard copy records are likely to be HR or financial records, which YSWN has a lawful obligation to store.

11. Privacy notices

YSWN aims to ensure that individuals are aware that their data is being processed, and that they understand:

- Who is processing their data
- What data is involved
- The purpose for processing that data
- The outcomes of data processing
- How to exercise their rights

To these ends YSWN has a privacy statement, setting out how data relating to individuals is used by YSWN. The privacy statement can be viewed on the YSWN website.

In addition to the Privacy Statement, YSWN issues privacy notices to individuals at the point that they submit their personal data to YSWN. The privacy notice below is one variation used for subscribers to the YSWN mailing list.

Your details are confidential and they won't be shared. Also, we will only send news about events, fundraising and member related news. Yorkshire Sound Women Network will use the information you provide on this form to be in touch with you and to provide updates and marketing. Please let us know all the ways you would like to hear from us:

- *YSWN can send me information via email*

You can change your mind at any time by clicking the unsubscribe link in the footer of any email you receive from us, or by contacting us at info@yorkshiresoundwomen.com. We will treat your information with respect. For more information about our privacy practices please visit our website. By clicking below, you agree that we may process your information in accordance with these terms.

12. Ongoing documentation of measures to ensure compliance

Meeting the obligations of the GDPR to ensure compliance will be an ongoing process. YSWN's DPO, supported by Directors and Associates, will:

- 1) Maintain documentation/evidence of the privacy measures implemented and records of compliance
- 2) Regularly test the privacy measures implemented and maintain records of the testing and outcomes.
- 3) Use the results of testing, other audits, or metrics to demonstrate both existing and continuous compliance improvement efforts.
- 4) Keep records showing training of employees on privacy and data protection matters.

13. Review

This policy will be reviewed by YSWN's Directors annually.

- **Date of adoption:** 23 May 2018

- **Date last reviewed:** 23 May 2018