

Medical Music Society of London

(Registered charity No. 1157835)

Privacy Policy Statement

3 May 2018

Summary

The Medical Music Society of London (MMSoL) collects, stores and uses contact and payment information and some other personal data as an essential part of our concert operations. In particular, we send regular emails to members and other contacts about forthcoming concerts that are considered to be of interest to them; we currently use Gmail for this task. We comply with all relevant legislation and, where there are judgements to be made, we apply the principle of proportionality - bearing in mind that we are a registered charity run by unpaid volunteers, focused solely on organising classical music concerts held at the Royal Over-Seas League in London, and are dependent on Membership subscriptions and income from ticket sales.

We aim to treat all our contacts (i.e. our Members, other attenders from the general public, our musicians and third parties with whom we engage) in an open, respectful and courteous way. We will amend or delete the personal information we hold on you if you so request.

Objectives

1. MMSoL is now a well-established and flourishing classical music society with the following charitable Objects:

- to advance, improve, develop and maintain public education in, and appreciation of, the art and science of music in all its aspects by any means the Trustees see fit, including through the presentation of public concerts and recitals;
- to further such charitable purpose or purposes as the Trustees in their absolute discretion shall think fit but in particular through the making of grants and donations.

2. We currently put on three or four concerts each year. Established in 2012 as the successor to the Royal Society of Medicine (RSM) Music Society, our concert series is well established and successful, with a loyal audience. Most of those who attend are Members of MMSoL, but the concerts are open to anyone.

3. MMSoL is run entirely by unpaid volunteers, under the leadership of a Committee of a minimum of six Trustees, including a Chairman, Treasurer and Secretary.

4. Regarding funding, we operate on the basis of Membership subscriptions and income from ticket sales. We do not receive grants from external bodies, but

occasionally receive legacies. We receive a 25% Gift Aid supplement on Membership subscriptions from those Members who complete our Gift Aid form.

Data Controller

5. Peter Richardson, Chairman of MMSoL,

Londmms@gmail.com

Data Processor

6. Peter Richardson, as above.

Collection of Information

7. MMSoL collects and holds information on persons interested in attending concerts:

- manually from new persons attending our concerts who request to be added to our mailing list, when they give us their contact details, which we then store;
- manually from new persons attending our concerts who ask to become a Member, and their contact details are also stored;
- electronically from new persons who contact us by email asking to be added to our mailing list (and those emails are kept); and
- occasionally from new persons telephoning or meeting a member of the Executive Committee and asking to be added to our mailing list (a record of such requests is kept).

8. Such new persons learn about us through word of mouth at other concerts (including from musicians performing there who have also played for us), or through our website, or by meeting an existing Member.

9. Our mailing contact list comprises the email, postal addresses and (for most) phone numbers of approximately 400 persons and has been built up over the last six years. Many email addresses were specifically given to us during that period by the persons concerned so that they might receive information about our concerts. In addition, to assist with the launch of our society in 2012 we also received a list of existing members of the RSM Music Society, and the RSM also assisted us by promoting our concerts to their membership for the first three years. We have never acquired names and contact data through any other means, and neither do we disclose them to entities outside MMSoL. Since we began operating in 2012, relatively few people have asked to be removed from our mailing list and our communications make clear that recipients can unsubscribe at any time. We have not received any complaints from recipients.

10. Moreover, the general nature of replies that we have received from Members and other concert attenders has been overwhelmingly positive, with people welcoming information about our concerts, and often writing to express appreciation after concerts.

11. We consider that this demonstrates that we are using the contact information in a helpful and responsible manner and that it confirms the desire of the persons we email to continue receiving the information that we send.

Information on our Concerts

12. Ordinarily, we send two to three emails in the weeks leading up to each concert to our list of contacts, informing them about the next concert and future concerts, and inviting them to purchase tickets. We also email members each year inviting them to the AGM.

13. Information about our concerts - past, current and future - is also advertised on our website: www.mmsol.org.uk and our Chairman also posts information via Twitter.

Legitimate interests assessment (LIA), Balancing exercise and Proportionality Considerations

14. We use personal data only in legal ways solely in pursuance of the stated Objects of MMSoL. We believe that our collection and use of contact information (primarily emails) conforms to the guidance from the Information Commissioner's Office (ICO): "Legitimate interest is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing".

15. We have applied the ICO tests as follows:

1- identify a Legitimate Interest

Our Legitimate Interest is the performance of classical music at the concerts that we organise in accordance with our charitable Objects, and that is the sole purpose of us contacting our potential audience.

2 - the data processing is necessary to achieve it

The processing is primarily the collection, storage and responsible use of email addresses since emailing is the most time- and cost- effective way of informing people about our concerts. We also collect and store postal addresses, for the dispatch of tickets, and phone numbers, in case a concert is cancelled and we need to contact attenders at short notice. We collect email addresses and other contact details only where we have good reason to believe that the person is interested in hearing classical music performed at our concerts.

3 - balance it against the individual's interests, rights and freedoms

We currently hold contact information on approximately 400 people, including around 100 Members. We do not collect or hold sensitive information on our contacts (such as their health condition) and within our operational limits we take reasonable and appropriate steps to safeguard the information that we do hold - recognising that MMSoL is run solely by a group of unpaid volunteers operating from home. We consider our use of personal data to be low risk.

We consider that sending information about our forthcoming concerts by email, in a well-established time pattern, is not intrusive (whereas 'cold calling' for instance would be intrusive), especially since emails can easily be deleted and we provide a means to unsubscribe. We therefore consider that any risks are more than out-weighted by the benefits to our contacts in terms of the information they receive about our concerts.

Moreover, as noted above, we have never received any complaints from recipients, and on the contrary we regularly receive expressions of appreciation from Members and other concert attenders, with requests to be kept on our mailing list for future events. Overall, we consider that we have attained a good balance in our use of personal information, and that our practices are proportionate in complying with the requirements of the General Data Protection Directive.

Access to Information

16. We will be pleased to provide anybody with copies of the information that we hold about them. Requests should be sent in the first instance to our Chairman, Peter Richardson at Londmms@gmail.com who will keep a record of the request and his response.

Correction and updating

17. We will correct and update any information that we hold as soon as is reasonably possible after being notified of the need to do so.

Disclosure and Erasure

18. MMSoL does not share or disclose to other persons or organisations, or sell to advertisers or other Third Parties, any of the personal information that we hold, except to HMRC as required by law for the purpose of recovering Gift Aid on membership subscriptions.

19. If a Member or other concert attender asks explicitly to have their personal information deleted we will delete that information from our mailing list, but their names and related details will remain in our accounting records to the extent required by law.

20. We will keep a record of all explicit requests for the deletion of personal information.

Personal Data Audit

A. Data Stored

21. MMSoL holds the following personal data on its Members and other concert attenders:

- some or all of the following: name, address, email address, telephone number(s), Membership subscription status;
- Annual subscription and ticket payment amounts and dates;
- Gift Aid declaration forms, and copies of Gift Aid submissions to HMRC;
- Occasionally bank details for those entitled to a refund for a particular concert, and who provide that information to us.

On individual musicians who have played, or may play, for us:

- name, address, email address and telephone numbers;
- CV and/or biographical notes they or their agent have provided us with (often including their nationality, age and educational affiliation and sometimes including a photograph);
- their MMSoL concert programme;
- their emails (and/or those of their agent) or other correspondence with us in the process of establishing the date of their concert and agreeing their programme;
- fee paid, and how;
- our record of the audience attendance number and the total income from ticket sales for their concert;
- data relating to their concert may also be used to provide periodic reports to MMSoL's committee, and at its AGM;
- our website lists information about every concert since 2012 and includes the name of each musician and the programme they played.

On third parties:

In the course of pursuing our Objects we necessarily engage with a range of external people, businesses and organisations. By way of illustration these include: performer agents/managers, other music societies, Royal Over-Seas League, and our bankers (CAF Bank). For each such Third Party we hold the following personal data:

- business name and address, email address, telephone numbers;
- their quotes for services to be provided and invoices for work completed;
- the date and amounts we have paid them (including their bank account details forwarded to us for that purpose); and
- a record of the key discussions/communications between them and us.

On members of our Committee who are the society's Trustees:

- name, address, date of birth, email address and telephone numbers and any other information required by the Charity Commission;
- other relevant personal data in their capacity as Members (see above);

- key email and other correspondence between Committee members on matters concerning the running of MMSoL;
- Papers prepared/presented at Committee meetings and at our AGM, together with minutes of each meeting;
- records of any reimbursements made for expenses necessarily incurred in support of the day-to-day concert operations.

Other:

- names, addresses and other pertinent data relating to any special payments or donations received (including legacies/bequests under a deceased's Will together with any specified spending conditions);
- our accounts for each financial year as filed with the Charity Commission;
- monthly CAF Bank statements;
- correspondence and other documents of lasting interest for our concert operations, such as our Constitution, letters/emails from the Charity Commission and HMRC

22. Except as indicated above MMSoL does not collect or store sensitive data (such as dates of birth, health conditions or personal preference information). We do not issue or store passwords relating to our contact persons.

23. All of the above Personal Data is processed solely for the purpose of meeting our specified Objects and it is not shared with any external party.

B. Means of storage

24. We store Personal Data:

- in Gmail, which is used to contact Members and other concert attenders;
- in Word and Excel documents on the computer hard drive and backup drives of our Data Controller and Data Processor, accessible only through a password. The computer on which data is held is a recent machine, running Windows 10, and is protected by McAfee SecurityCentre;
- on paper (including bank statement copies, copies of paying-in slips and Gift Aid forms);
- in the data systems of CAF Bank;
- online on our website, hosted by XILO on UK-based servers and powered by WordPress;

25. Where the above Personal Data is stored on personal home computers, sensible practical arrangements are in place to safeguard such equipment and data (as for all our other personal domestic possessions and information).

26. Where the above are Third Party organisations, MMSoL does not have detailed information on where or how the data is held, but those Third Party organisations are themselves responsible for meeting the relevant regulatory requirements.

C. Period of Storage

27. Contact details stored for the purpose of sending out information on our concerts will be kept as long as MMSoL continues, or as long as it appears to be useful, or until the contact requests its erasure, whichever is the sooner.

28. Information relating to financial transactions and Gift Aid will be stored by us for as long as is required by the relevant regulations.

29. Information of a more general nature will be stored indefinitely, or until such time as it is deemed by us to be of no further interest.

D. Backups and Deletions

30. In order to protect the integrity of our stored electronic data, we make regular back-ups. In practice back-ups are hardly ever used but are a wise precaution in case of hard disk failure, virus attack etc.

Complaints

31. If you have any concerns about the way in which we process personal information, please address your concerns to our Data Controller, Peter Richardson (see para 5 above), who will do his best to resolve your concern.

32. You are also entitled to make a complaint to the Office of the Information Commissioner (<https://www.ico.org.uk/concerns/>) but we hope that you will contact us first about any concerns and we will do our best to resolve them. We will send you copies of the information that we hold about you if you request it and we will correct and update that information as necessary. We aim to treat you with courtesy and respect.