

DATA PROTECTION POLICY

Three Choirs Festival Ltd Data Protection Registration No: A8027518

Security number: CSN9295212

Three Choirs Festival Data Protection Officer: Robert Convey, Sales and Communications Manager

Policy Review Date: October 2025 [This policy must be reviewed at least once every 12 months].

BREACHES OF SECURITY

If a breach of security occurs the ICO (Information Commissioner's Office), must be informed within 72 hours. Any mediating action recommended by the ICO must be enforced as a matter of priority, to avoid prosecution.

It is imperative that all staff and trustees notify the Sales and Communications Manager and/or Chief Executive immediately if they suspect personal data has been compromised.

In the event of a security breach TCFL will endeavour to contact all affected individuals and provide further information as necessary.

Brexit and Conducting Business with Customers in the EEA

From January 2021 onwards, following the end of Britain's transition period for leaving the European Union, the Three Choirs Festival Ltd will commit to retaining its full compliance with GDPR (2018) regulations. The organisation will, in line with the following guidance from the ICO about organisations who are low risk, not be appointing a business representative in the EEA:

You do not need to appoint a representative if either:

- *you are a public authority; or*
- *your processing is only occasional, of low risk to the data protection rights of individuals and does not involve the large-scale use of special category or criminal offence data.*

Full details regarding the necessity to appoint EEA business representatives can be found at <https://ico.org.uk/for-organisations/data-protection-at-the-end-of-the-transition-period/data-protection-at-the-end-of-the-transition-period/the-gdpr/european-representatives/>.

DEFINITIONS

Personal Data – Contact details which may include full name, address, telephone number, email address and contact preferences.

Sensitive Data – Date of birth, details of relationships, details of access requirements, history of correspondence with the organisation, accident and incident reports or other such information.

PROCESS FOR THE COLLECTION AND STORING OF CUSTOMER DATA AT THE THREE CHOIRS FESTIVAL LIMITED

- Customer data is captured and stored as part of the process of booking tickets and taking donations / sponsorship for the Three Choirs Festival and its agent ticketing clients. There will be Two forms of record:
 1. Paper records in the form of ticket booking forms & Gift Aid Declarations.
 2. Computer records on the Three Choirs Festival CRM [Customer Relationship Management] system Spektrix, and on Sage Accounts [in certain circumstances].
- All customer information from paper records [booking forms] is entered into Spektrix, as part of processing the ticket order, ensuring that our records are kept as up to date as possible. When customers are dealt with over the telephone, it is also part of procedure that personal details are collected, or checked for accuracy, depending on the relevant course of action. When e-mails are received containing personal information in the form of mailing list

applications, these details are entered onto Spektrix as soon as possible and the original e-mails permanently deleted.

- At point of sale, the following details will be taken or checked as standard, for every customer:

Title

First name or organisation

Surname

Telephone number *[To enable Three Choirs Festival Limited (TCFL) to contact customers in the event of query. TCFL does not undertake cold calling].*

E-mail address *[To enable TCFL to send e-mail confirmations of ticket purchases and invoices].*

Full postal address including postcode *[To enable TCFL to post out pre-purchased tickets and invoices].*

Gift Aid status

- This information is captured (as demonstrated above) for communication purposes, allowing TCFL to offer good customer service, and to function successfully as a business. At the point of data entry, all customers are given the option to opt into receiving marketing materials by post and email. TCFL does not use the telephone as a marketing tool. Marketing materials are only sent to those who request them. All TCFL e-mail marketing gives the customer the option of unsubscribing if they wish, at any time. No further e-mails will be sent once a customer has unsubscribed.
- If a customer is booking for an event that is promoted by one of the Three Choirs Festival's agent ticketing clients, they will be asked whether or not they would be happy to hear from that organisation about future events by e-mail/post, and information will only be passed on with the prior consent of the customer.
- As beneficiaries of the service all singing members of both Gloucester and Hereford Choral Society who give permission will be added to our customer database and tagged as such for online booking purposes.
- On some occasions, the TCFL may send out information about events being promoted by one of its agent ticketing clients, either as part of one of its own newsletters, or on behalf of the particular organisation. In these instances, information will be sent by TCFL directly and no data will be shared with the third party.
- All customers will be asked to choose which categories of event they would be happy to hear from TCFL about, including those of its agent ticketing clients, and database segmentation will be carried out based on those choices.
- Customers making non-point-of-sale donations and festival sponsorship will have the personal details referred to above entered into Sage Accounts. Data entered into Sage will be used for invoices, credit notes and credit control only. All customers will be informed of this process.
- If a confirmed donor signs a paper gift aid declaration, their Gift Aid status will be recorded on Spektrix. The paper copy will be kept in a lockable filing cabinet for auditing purposes.
- All customers are asked whether or not they are happy for their details to be passed on to other third parties and festival partner organisations. Details will not be passed on without this consent having been given by the individual.
- In some instances, information of a sensitive nature may be captured on the Box Office system, to aid with good customer service (for example, if a customer uses a wheelchair, or is blind and has to bring their guide dog etc). Information of this nature will only be stored with the prior consent of the customer.
- In some instances, specific information (such as age and ethnicity) may be required for funding or statistical purposes. This information will only be stored for the duration of the project for which it has been collected, and only with the prior consent of the customer.
- A customer record will be de-activated on request or once 2 clear festival cycles have been completed with no activity (i.e. 6 complete TCFL financial years). After 3 years of no activity, customers will be tagged as lapsed, allowing for targeted re-engagement marketing in line with customer contact preferences. The year 2020 will not be included as part of a 3-year cycle but treated as an exception, as no festival business took place during this financial year.

PROCESS FOR THE COLLECTION AND STORING OF PERSONAL DATA RELATING TO EMPLOYEES, PERFORMERS AND TRUSTEES OF THE THREE CHOIRS FESTIVAL LIMITED

- As part of the recruitment process for management staff, artists and trustees at the Three Choirs Festival Limited, any or all of the following information will be collected:
 - Application forms/CVs
 - References
 - Contracts of Employment
 - Equal Opportunities Monitoring forms
 - Artist information forms
 - Emergency contact details & doctor's information
- There will be three forms of record:
 1. Paper records held in a locked cabinet under the control of the Head of Finance
 2. Digital records in a confidential folder on server, or within Artifax event management system, access restricted.
 3. Sage payroll database at TCFL's accountants who process the payroll on our behalf.
- On entering employment with the TCFL all staff will sign a formal contract. Performers will be issued with contracts for their appearance prior to the relevant festival. Both paper and digital copies of the contracts will be kept for the duration of employment, followed by a further period to comply with HMRC regulations (currently 6 years as at January 2018).
- Other items of personal information such as emergency contact details, doctor's information, application forms/CVs and references will be held by the Head of Finance, for use by the Chief Executive and an employee's Line Manager only and deleted in line with above.
- All financial records relating to an individual's employment with the Festival will be held by the Head of Finance for a period to comply with HMRC regulations (currently 6 years as at January 2018).
- When an employee leaves TCFL their email files will be converted to a shared inbox, accessible by members of staff as is necessary for the continuation of business. Employees should avoid using TCFL accounts for personal correspondence, and it is the employee's responsibility to remove any personal, non-business content before departure.

PROCESS FOR THE COLLECTION AND STORING OF PERSONAL DATA RELATING TO MEMBERS OF THE THREE CHOIRS FESTIVAL VOICES

- On signing up to the Festival Voices, individuals will be asked to provide contact details and voice part information via a secure Microsoft online form. With the individual's permission, this information will be kept for the duration of their relationship with the festival on a securely stored and password protected excel spreadsheet.
- Other items of personal information such as emergency contact details and doctor's information may be requested separately. This information may be kept in paper and electronic format (again secure and password protected) and will be accessed by the Artistic Planning Manager and Participation Co-ordinator only, except in the event of an emergency.
- This information will be destroyed as confidential waste or permanently deleted annually following the festival, providing no incidents or accidents have been recorded.

PROCESS FOR THE COLLECTION AND STORING OF PERSONAL DATA RELATING TO VOLUNTEERS OF THE THREE CHOIRS FESTIVAL

- On signing up to the volunteers' database, individuals will be asked to provide contact details and to let TFCL know what they would like to help with. With the individual's permission, this information will be kept securely for the duration of their relationship with the festival on a securely stored and password protected excel spreadsheet.
- Other items of personal information such as emergency contact details and doctor's information will be requested separately. This information may be kept in paper and electronic format (secure and password protected) and will be accessed by the Production Manager only except in the event of an emergency.
- This information will be destroyed as confidential waste or permanently deleted annually following the festival, providing no incidents or accidents have been recorded.

PROCESS FOR THE COLLECTION AND STORING OF PERSONAL DATA RELATING TO MEMBERS OF THE THREE CHOIRS FESTIVAL CHORUS

- All members of the Three Choirs Festival chorus will need to take an audition. All pre-audition agreements and notes from these auditions will be stored securely either in paper or electronic format and accessed only by the Artistic Directors, Chorus Managers and the Artistic Planning Manager.
- On joining the chorus, members will be asked to sign a contract. All contracts will be kept securely, either in paper or electronic format for a clear festival cycle (3 years) at which point all members of any given chorus contingent will need to re-audition.
- Other items of personal contact information will be requested separately. This information may be kept securely in paper or electronic format and will be accessed only by the Chorus Managers, Artistic Planning Manager, Sales and Communications Manager or Digital Marketing and Sales Coordinator.
- All the above information will be destroyed as confidential waste or permanently deleted either after a clear festival cycle (3 years) when re-audition will be necessary, or when it ceases to be of further use to the organisation.

PROCESS FOR THE COLLECTION AND STORING OF PERSONAL DATA RELATING TO CHILDREN

- All children under the age of 18 will only be able to perform in TCFL events with parental consent. For children directly engaged by the festival (e.g. youth choir, choristers, volunteers) parental consent is sought directly. Visiting ensembles/artists are asked to confirm consent has been given if any performers are under 18
- The festival does not allow volunteers under the age of 16 unless they are under the constant supervision of a parent. Parents of 16-18-year olds will be asked to provide consent and information collected subsequently will be treated in the same way as for adult volunteers (see above)
- Children who are of compulsory school age at the time of the festival and are performing will need to be licenced by the local authority, meaning that information will be shared with the local body in order to secure the licence.
- Where consent is given for children to perform, other items of personal information such as emergency contact details, dietary requirements and doctor's information will be requested from the parent to help the festival in looking after their child. This information may be kept in paper and electronic format (secure and password protected), and will be accessed by the Artistic Planning Manager and the Chorister Care/Chaperone Team only.
- Where a child is attending a workshop and a workshop leader or TCFL is acting *in loco parentis*, parents are asked to complete a form outlining relevant personal data if they are not remaining at the venue for the duration of the event. This information is kept by the event manager (forms completed prior to the event are stored securely by the box office) and then returned to the box office to be securely destroyed immediately after the event.
- Information will be destroyed as confidential waste or permanently deleted following the festival, providing no incidents or accidents have been recorded, and with the exception of information allowing TCFL to identify which photographic materials captured in the course of the festival are permissible for future use. Information relating to photographic consent will be securely destroyed when archive images are no longer in promotional use (generally for no more than a 3-year cycle).

DISCLOSURES OR SAFEGUARDING CONCERNS

- Disclosures and safeguarding concerns can apply to children under the age of 18 or to vulnerable adults.
- Any safeguarding disclosures or allegations will be reported to one of the TCF Designated Safeguarding Officers (namely the Chief Executive, Artistic Planning Manager, Production Manager or Participation Coordinator) in strict confidence. With a TCF DSO a reporter will complete an incident report form which will be shared with the Designated Safeguarding Adviser (usually a cathedral safeguarding lead) as the basis for a discussion about what action should be taken.
- All incident reports, along with written advisory notices from the DSA, will be kept securely either in paper or electronic format (saved in limited access Sharepoint folders and password protected) and destroyed as confidential waste or permanently deleted once they are no longer required (generally for no more than a 3-year cycle). A copy is given to the DSA for secure storage and on rare occasions copies may also be required by the police or local authority.

PROCESS FOR COLLECTION AND STORING SUPPLIER DATA AT THE THREE CHOIRS FESTIVAL LIMITED

- At the point that a first purchase invoice is received a supplier account is opened in the accounting software:
 - Name
 - Company Name [if applicable].
 - Address
 - Telephone number if applicable
 - E-mail address if applicable
- The receiving of an invoice from a supplier will be taken as confirmation that they are happy for their information to be entered into sage in order to process the cost.
- A supplier record will be de-activated on request or once a clear festival cycle has been completed with no activity (i.e. 3 complete TCF financial years).

MEASURES FOR SECURITY OF DATA

Paper Records

- All paper records of customer bookings and donations will be kept for 6 financial years and thereafter destroyed as confidential waste.
- During this period, these paper records will be stored in a locked filing cabinet, which will only be opened for the purposes of filing or making data checks.
- Any paper copies of Gift Aid declarations will be kept in a locked filing cabinet and will be kept for a period of 6 financial years from the point at which it becomes inoperative.
- A gift aid declaration can be revoked at any time, at which point the Gift Aid status on Spektrix will be updated.
- Staff files, including contracts, will be held for the duration of employment plus a period of 6 years to allow for review and audit purposes. During this period, viewing either by members of the festival, auditors, or the ex-employee can be requested via the Head of Finance.
- Staff financial records will be held for a period to comply with HMRC regulations (currently 6 years as at January 2018).
- Other personal information such as emergency contact details/doctor's contact details etc will be held centrally by the Head of Finance. This information is in case of emergency only and will only be used or shared if strictly necessary, amongst the Festival Central Management Team. All paper copies of this information will be destroyed when employment with the Three Choirs Festival Limited is terminated.
- All paper records held relating to employees of the festival, will be securely stored in a lockable filing cabinet under the control of the Finance Manager.
- All paper records relating to membership of the Festival Chorus or volunteering will be kept in a locked filing cabinet under the control of the Production Manager and Artistic Planning Manager.
- A Gift Aid declaration can be revoked at any time by contacting the Three Choirs Festival office, at which point any paper records on file will be held for a period to comply with HMRC regulations (currently 6 years as at January 2018).

Computer Records

- The IT systems which Three Choirs Festival use to store personal data are cloud-based, which means that confidential information is not stored on a server hosted by the festival. In addition, payroll records are kept by the festival accountants who process the payroll.
- All computer records of confidential information are stored in any one of five places:
 1. Microsoft Office 365 (*Now requires dual authentication for access*)
 2. Spektrix CRM system
 3. Artifax event management system
 4. Sage Accounts

5. Sage payroll

- These companies fully protect their servers against theft of confidential information.
- Spektrix uses the following data sub-processors to help support various elements of the CRM platform:
 - **Amazon Web Services (AWS), Inc.** (<https://aws.amazon.com/>): AWS services are used as part of our system backup features. AWS also hosts a part of the Spektrix platform responsible for card payment processing.
 - **Loho Limited** (<http://www.loho.co.uk/>): Loho provides parts of the Spektrix network infrastructure.
 - **Microsoft Azure** (<https://azure.microsoft.com/>): Azure is a cloud computing and data centre provider used to host some parts of the Spektrix platform.
 - **Pulsant Limited** (<https://www.pulsant.com/>): Pulsant is the operator of our data centre, where the physical Spektrix infrastructure is located.
 - **Mailgun Technologies, Inc** (<https://www.mailgun.com/>): Mailgun is the email service we use for sending system emails, such as order confirmations and password resets.
 - **Cloudflare, Inc.** (<https://www.cloudflare.com/>): Cloudflare provide caching, load balancing and security services for the Spektrix infrastructure.
 - **Zapier Inc.** (<https://zapier.com/>): Zapier is a cloud-based tool, used to automate the transfer of some Spektrix business data including system user data (not end-customer data).
 - **Google.com** (<https://www.google.com/>): Google is a web-based suite of tools, used to automate the transfer of some Spektrix business data including system user data (not end-customer data).
 - **Logz** (<https://logz.io/>): A cloud-based log management platform, to collect and process log data related to Spektrix operations.
 - **Zerobounce** (<https://www.zerobounce.net/>): A tool to help validate email addresses to make sure Spektrix has accurate, up-to-date data in its database.
 - **Associ8** ([Associ8 - Dynamic flexible associations with HubSpot Workflows](#)): Associ8 is a tool to help automate association between contacts and companies within the Spektrix database.

Full details of Spektrix secure approach to data sub-processors can be found in their Privacy and Security Policy (copy available on request).

- The broadband at Three Choirs Festival used to access cloud-based tools is regularly scanned for vulnerabilities as part of PCI DSS compliance requirements. Any vulnerabilities shown up by a failing scan are treated as a priority and fixed in a timely fashion.
- The Three Choirs Festival broadband is protected by a firewall router which adheres to PCI DSS compliance requirements.
- All laptops used for home working (both TCFL and personally owned) are connected via Draytek Smart VPN client to the office network. This VPN must be connected at all times when accessing personal or sensitive data especially through Spektrix.
- NO personal or sensitive information should be accessed via mobile phone broadband.
- All laptops used by the Three Choirs Festival run Microsoft Defender antivirus software, which regularly scans for and eliminates any viruses, malware etc.
- No files containing confidential information will be stored on the hard drive of any laptop. Files may be saved to the hard drive for a short time whilst a specific task is being performed but must be deleted entirely, immediately after the task is finished.
- Any passing on of files containing confidential information must be done by secure means.
- Confidential information will not be shared with people living outside the EEA except in very special circumstances. If these circumstances arise, every effort will be made to ensure the security of the data in transit as well as when it reaches its destination. In these instances, an audit trail of the decision-making process and risk assessment of the transfer will be kept.
- Before disposing of any computer equipment, the hard drive will be completely formatted ensuring that no retrievable data remains.

FESTIVAL ACCESS TO PERSONAL DATA

- Access to all personal information will be restricted and granted only to members of the TCFL Central Management Team that require it for the day-to-day activity of their jobs. Systems with restricted access will include:
 1. Microsoft Office 365
 2. Spektrix CRM system
 3. Artifax event management system
 4. Sage Accounts
 5. Sage payroll
- Access to information can be granted to the wider Festival membership by contacting members of the TCFL central management team as follows:

Customer related information/statistics – Sales and Communications Manager

Sales Data – Sales and Communications Manager

Reports on the success of marketing initiatives/Database segmentation – Sales and Communications Manager

Fundraising Updates – Development Manager/Trusts and Foundations Manager

HR related information – Head of Finance

Financial information – Head of Finance

Artists/Chorus Information – Artistic Planning Manager

Volunteers Database – Production Manager

Should any of the above employees be unavailable, the CEO of the TCFL has access to all systems, and can provide information on request, as well as change access permissions for digital files.

All members of the Festival wishing to have access to the above information must read and sign a copy of this policy and agree to abide by it. At no point will sensitive information be passed to the wider membership.

REQUESTS FOR A PRIVACY NOTICE

- Any customer/employee of the Three Choirs Festival can request to see the information that the company holds about them, at any time.
- All requests must be responded to within 14 days of receipt.
- For no cost, the following information will be provided:
 - Date the information was gathered.
 - Purpose for which the information was gathered and why it has been kept.
 - How long it will be kept for going forward.
 - All information on file regarding that customer/employee, including any sensitive data.
- A copy of our Data Privacy Notice template is attached as appendix A

Policy produced by Robert Convey
Head of Sales and Development
Three Choirs Festival Ltd

APPENDIX A

TEMPLATE FOR PRIVACY NOTICE

Privacy Notice

This document constitutes a full and accurate record of all the information held by the Three Choirs Festival about the below named individual. Details are only kept for those people who are active customers or suppliers of the Three Choirs Festival.

Full name:

Date information collected:

Audit trail of significant changes made to the data since this point

Personal Details

Address:

Telephone Number:

Mobile Number:

E-mail Address:

Society Membership Names:

Partner/Spouse's Name:

Contact Preferences:

Details of Customer Tags:

Details of Memberships Held:

Record of Gift Aid Declaration:

Record of any Relationship to another individual/organisation:

Any further notes:

Transaction/Donation History