Easter Orchestral Society (EOS)

Data Protection and Retention Policy

Key details: Policy prepared by the EOS Committee (Updated 2026)

Introduction

To operate, the Easter Orchestral Society (EOS) needs to gather, store, and use certain forms of information about individuals. These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts, and other people the group has a relationship with or regularly needs to contact. This policy explains how this data should be collected, stored, and used to meet EOS data protection standards and comply with UK GDPR and the Data Protection Act 2018.

Why is this policy important?

This policy ensures that EOS:

- Protects the rights of our members, volunteers, and supporters
- Complies with data protection law and follows good practice
- Protects the group from the risks of a data breach

Who and what does this policy apply to?

This applies to all those handling data on behalf of EOS, including:

- Committee members
- Employees and volunteers
- Members
- Contractors and third-party suppliers

It applies to all data that EOS holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

Roles and responsibilities

EOS is the Data Controller and will determine what data is collected and how it is used. The Data Protection Lead for EOS is the Secretary. The Secretary, together with the Committee, is responsible for the secure, fair, and transparent collection and use of data by EOS. Any questions relating to the collection or use of data should be directed to the Data Protection Lead.

Everyone who has access to data as part of EOS has a responsibility to ensure that they adhere to this policy.

If EOS uses third-party Data Processors (e.g. Mailchimp) to process data on its behalf, EOS will ensure all Data Processors comply with UK data protection law.

Data protection principles

a) We fairly and lawfully process personal data in a transparent way

EOS will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name and contact details will be collected when they first join the group, and will be processed on the basis of contractual necessity and legitimate interests to manage group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for subscriptions
- The name and contact details of volunteers, employees, and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their role
- Further information, including personal financial information and criminal records information, may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check)
- An individual's name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event
- An individual's name, contact details, and other details may be collected at any time (including when booking tickets or at an event), with their explicit consent, in order for EOS to communicate with them about and promote group activities
- Pseudonymous or anonymous data (including behavioural, technological, and geographical data) on an individual may be collected via tracking cookies when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels

b) We only collect and use personal data for specific, explicit, and legitimate purposes and will only use the data for those specified purposes

When collecting data, EOS will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

c) We ensure any data collected is relevant and not excessive

EOS will not collect or store more data than the minimum information required for its intended purpose. For example, telephone numbers are collected from members to enable contact regarding group administration, but data on marital status or sexuality is not collected.

d) We ensure data is accurate and up to date

EOS will ask members, volunteers, and staff to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Lead.

e) We ensure data is not kept longer than necessary

EOS will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records). The storage and intended use of data will be reviewed in line with the EOS data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

f) We keep personal data secure

EOS will ensure that data held by us is kept secure.

- Electronically held data will be stored within a password-protected and secure environment, utilising two-factor authentication where available
- Passwords for electronic data files and shared accounts will be reset each time an individual with data access leaves their role
- Physically held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard
- Keys for locks securing physical data files should be collected by the Data Protection Lead from any individual with access if they leave their role, and combination lock codes should be changed promptly

- Access to data will only be given to relevant committee members or contractors where it is clearly necessary for the running of the group

g) Transfer to countries outside the UK

EOS will not transfer data to countries outside the United Kingdom, unless the transfer is to the European Economic Area (EEA), a country covered by UK adequacy regulations, or appropriate safeguards are in place.

Individual Rights

When EOS collects, holds, and uses an individual's personal data, that individual has the following rights over that data:

- Right to be informed
- Right of access
- Right to rectification
- Right to object
- Right to erasure
- Right to restrict processing
- Rights related to portability and automated decision making (including profiling), where appropriate

Individuals also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if they believe their personal data has been handled improperly.

How we get consent

EOS will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote performances, updating them about group news, fundraising, and other group activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a tick box)
- A clear and specific explanation of what the data will be used for

Data collected will only ever be used in the way described and consented to. Every marketing communication will contain a clear method through which a recipient can withdraw their consent.

Member-to-member contact

We only share members' data with other members with the subject's prior consent.

Cookies on the EOS website

A cookie is a small text file downloaded onto a device (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store information about preferences or past actions. EOS may use cookies on the website to improve user experience and monitor overall engagement. We will implement a cookie banner allowing users to consent to or decline non-essential cookies, alongside a link to our Privacy Policy.

EOS Data Retention Policy

Retention framework and operational procedures

Context and purpose

This policy sets out how EOS will approach data retention and establishes processes to ensure data is not held for longer than is necessary. It forms part of the EOS Data Protection Policy.

Roles and responsibilities

EOS is the Data Controller and will determine what data is collected, retained, and used. The Data Protection Lead for EOS is the Secretary. They, together with the Committee, are responsible for the secure and fair retention and use of data by EOS.

Regular review

A regular review of all data will take place every two years (and no more than 27 calendar months after the preceding review) to establish if EOS still has valid reason to keep and use the data held.

Data to be reviewed

- Digital documents (e.g. spreadsheets) stored on personal devices held by committee members
- Data stored on third-party online services (e.g. Google Drive, Mailchimp)
- Physical data stored at the homes of committee members

Who the review will be conducted by

The review will be conducted by the Data Protection Lead alongside other committee members appointed by the Committee.

How data will be deleted

- Physical data will be destroyed safely and securely, including shredding
- All reasonable and practical efforts will be made to remove data stored digitally
- Priority will be given to active contact lists and sensitive personal records
- Where deleting specific records would affect other data that EOS has a statutory requirement to keep, the data will be archived securely and excluded from active use

Retention criteria

The following criteria will be used to decide what data to keep and what to delete:

- Is the data stored securely?
- Does the original reason for holding the data still apply?
- Is the data being used for its original intention?
- Is there a statutory requirement to keep the data?
- Is the data accurate?
- Where appropriate, do we have valid consent to use the data?
- Can the data be anonymised?

Specific retention procedures

- **Statutory Requirements:** Data stored by EOS may be retained based on statutory requirements other than data protection legislation, including Gift Aid declarations, payment records, committee minutes, supplier contracts, insurance policies, and tax records
- **Member Data:** When a member leaves EOS and all administrative tasks are complete, sensitive data (such as bank details) will be deleted promptly. Contact details will be removed from active mailing lists unless explicit consent has been given. General administrative records will be reviewed during the regular two-year review

- **Mailing List Data:** If an individual opts out of a mailing list, their data will be removed from active distribution immediately
- **Volunteer and Freelancer Data:** When a volunteer or contractor stops working with EOS and administrative tasks are complete, any sensitive data will be deleted. Other records will be retained safely and assessed at the next two-year review
- **Other Data:** All other miscellaneous data will be assessed as part of the regular two-year review cycle