



# THE EAST RIDING OF YORKSHIRE BAND

Privacy Notice – May 2018

## We value your data and take your privacy seriously.

This policy describes how The East Riding of Yorkshire Band collects and uses your personal information when you interact with our Website ([www.eryb.co.uk](http://www.eryb.co.uk)) or otherwise, including when you purchase tickets for our events. We have tried to keep it simple, so please take time to read this policy in full to understand our practices regarding your personal information. This policy was last updated in **May 2018**.

## Introduction

1. In this document, "we", "our", or "us" refer to The East Riding of Yorkshire Band.
2. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
3. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
4. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
5. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
6. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
7. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
8. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## Use of Cookies

Please be aware that cookies are used on our website, our policies on cookies can be accessed here via the link provided on the website.

## How we collect information about you

We may collect personal and non-personal information about you when you interact with The East Riding of Yorkshire Band via the Bands websites or otherwise as set out in this policy:

- We collect personal information:
  - from you if you sign up to receive our newsletters, emails or alerts.
  - about people who provide feedback in relation to any of the Websites.
  - that you provide in relation to any user account you may hold with us for any of the Websites.
  - when you sign up to The 100 Club or become a Patron of the Band.
  - that you provide when you register for and participate in our events.
  - when you enter prize draws or competitions.

- We collect personal information (such as your name, postal address, phone number, e-mail address and credit/debit card number) that you provide in relation to any enquiry, order or transaction you carry out through our website.
- We may collect personal information when you choose to complete any surveys we send you.
- We use software that collects personal information that you provide in relation to enquiries, orders or transactions that you start on the website but which you then abandon or do not complete, i.e. the data may be captured regardless of whether you click “next” or “submit” on the relevant page.
- We also collect certain non-personal information when you visit and use the website. For example, we may collect and store your IP address, reference site domain name, and demographic information. We also may collect information including, but not limited to, traffic data, location data and usage while on our website. We will only collect such data in aggregate form (so that no individual user is identified).
- We collect personal information that you provide if you apply to join the Band.

## How we use your personal information

### 1. Purchases via the website

We collect your name, contact and payment details and other personal information you provide when you order or purchase products and services from us via our website, including when you purchase tickets for our events. We will use this personal information to process your order/purchase. Where you have purchased products/services from the website, our online payment gateway providers will retain the payment details you provided for that purchase for as long as is necessary from the date of the purchase to allow us to process any refund that may be due to you. This processing of your information is necessary for the performance of our sales contract with you.

We will retain the information you provide to us for your purchase for a period of up to ten years from the date of your purchase for analysis purposes to understand audiences for our events at each venue and to improve efficiencies in general and at particular venues. This processing of your personal information is necessary for our legitimate interests of understanding our customers and providing better products and services for our customers. We will not store your payment details for this purpose.

We collect information about you when you start an enquiry, order or transaction on the Website but which you then abandon or do not complete. We collect your personal information even if you do not click “next” or “submit” on the relevant page. We may use this information to contact you by email about that enquiry, order or transaction. Such contact will be to determine if we can offer any assistance to help you complete the enquiry, order or transaction, or if we can provide alternative products or services that may be of greater interest to you. We will not store your payment details for this purpose. The legal basis for processing your personal information in this way is that it is necessary for our legitimate interests to promote our products/services to you. When we collect your information, we will give you the option not to receive these emails. Otherwise, we will retain your personal information for up to ten years for our legitimate interests of understanding our customers and users of our website.

### 2. Enquiries, providing feedback or complaints

We collect your name, contact details and other personal information you provide when you make an enquiry or provide feedback. We may collect this information via completion of online forms or by corresponding or speaking with us by telephone, email, letter, in person or otherwise. We will use your personal information to process your enquiry, to follow up on your feedback and to resolve any complaint. We will keep your personal information for as long as is necessary to address your enquiry, feedback or resolve your complaint and to respond to any follow up queries or subsequent correspondence from you on your enquiry, feedback or complaint. This processing is necessary for our legitimate interests in providing a better experience for you and others who interact with The Band and in improving our customer service and operations.

When you contact us, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

### **3. Registering to receive our newsletters, emails and alerts**

We will collect your name and email address and other information you provide when you register to receive our newsletters, emails or alerts via our website. We will use this information to send you the newsletters, emails or alerts you request. We will send you these with your consent which we obtain at the point you request these regular updates. You may withdraw your consent to processing your personal information for this purpose at any time by contacting us or by clicking “unsubscribe” in the communications we send you. We will retain this information until you withdraw your consent.

### **4. Membership of the Patrons Scheme**

To enjoy Patrons membership, we process personal information about you that we need to process your membership application (where applicable), to provide you with Membership Benefits and services you expect from your membership which includes showing and emailing you exclusive offers, promotions and content we believe will interest you most. We use your personal information for these purposes only. We collect this information from you via your registration as a Patron and your other interactions with us. This processing is necessary for the performance of our contract with you for membership in accordance with the terms and conditions of Patrons Scheme. It is also necessary for our legitimate interests of understanding our customers and promoting our products and services. We retain your personal information and process it for as long as you are a member of the Patrons Scheme. We cannot process or administer your membership of the Patrons Scheme if we do not carry out the above processing of personal information or if you do not provide the information required by the registration process.

### **5. Membership of the 100 Club**

To enjoy membership of the 100 Club, we process the personal information about you that we need to provide you with services you expect from your membership which includes showing and emailing you exclusive offers, promotions and content we believe will interest you most. We use your personal information for these purposes only. This includes notifying you about our monthly winners. We collect this information from you via your registration with the 100 Club and your other interactions with us. This includes your contact details. This processing is necessary for the performance of our contract with you for membership of the 100 Club in accordance with the terms and conditions of the 100 Club. It is also necessary for our legitimate interests of understanding our customers and promoting our products and services. We retain your personal information and process it for as long as you are a member of the 100 Club. We cannot process or administer your membership of the 100 Club if we do not carry out the above processing of personal information or if you do not provide the information required by the registration process.

### **6. User account registration with our Websites**

When you create a user account with our website, we collect your name and contact details and other personal information you provide during user account registration. We will retain this personal information for the duration of your user account with us. We will process your personal information to administer and maintain your user account. This processing of your personal information is necessary for our legitimate interests of allowing our customers to engage with us and to complete transactions for our products/services more easily.

### **7. Marketing and Advertising**

We may use the personal information we collect as part of our customer relationship with you to inform you by email about exclusive offers and promotions we think may be of interest to you. When we collect your personal information, we will give you the option not to receive these emails. You can change your mind at any time by contacting us or by clicking “unsubscribe” in the emails we send you. This is necessary for our legitimate interests for promoting our products and services.

We also engage in online advertising including on social media. We think our products and services are pretty great and we wouldn't want you to miss out. It is in our legitimate interests to promote and advertise our products and services. Sometimes we use tools to help us with this including Facebook Audience Builder but we only ever receive anonymised data from Facebook. For more information, please also see our cookies policies listed above.

## 8. Your interactions with The East Riding of Yorkshire Band

Often, individuals will interact with us in multiple ways and will provide us with personal information in different contexts. We may use your personal information, including your purchase history, to obtain a profile of your different interactions with us and to understand you and other customers including your interests and preferences. This is necessary for our legitimate interests of personalising your experience and tailoring the content, offers and promotions we send to you and other customers. It also helps us to improve and better promote our products and services.

When you visit our website or receive e-mails from us (including newsletters) we may automatically collect the following technical information:

- technical information, including the Internet protocol (IP) address used to connect your computer device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time).
- page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.
- information provided by cookies. Our Websites use cookies to improve the user's experience while visiting our Websites. Please refer to our cookies policies which can be accessed here via the link provided on the website.
- when we e-mail you, such e-mails may contain tracking facilities. Activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include but is not restricted to: the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity.

We may collect information in an aggregated form (so that no individual user is identified) for statistical analysis to allow us to understand our customers and improve our services and performance including the functionality of our Websites and user experience.

The legal basis for processing your personal information (as well as pseudonymised or anonymised information generated from your personal information) in this way is that it is necessary for our legitimate interests of providing a better experience for you and other users of our websites promoting our products and services and understanding our customers and users of our website. We will retain your personal information (as well as pseudonymised or anonymised information generated from your personal information) for as long as is necessary for the relevant activity.

## 9. Competitions

We collect and use personal information that you provide to us when you enter one of our competitions to administer the competition including to communicate whether your entry has been successful or not and fulfilment of prizes. Our legal basis for this processing is your consent which you give on entering the competition. We will retain your information for as long as is necessary for those purposes. If you withdraw your consent, we cannot process your competition entry.

## The kind of information we hold about you

We typically collect personal information from you through the recruitment process and in the course of your engagement with us, as well as from publicly accessible sources, via our IT and other systems and third parties such as employment agencies.

We may collect, store, and use your personal information, including:

- Personal details such as name, address, date of birth, photographs, telephone numbers, personal email addresses and emergency contact information.
- Information about your use of our information and communications systems.
- Images of you taken at an event.

We may also collect, store and use "special categories" of more sensitive personal information (which requires a higher level of protection) such as health information and information about criminal convictions and offences.

## How we use information about you and our legal bases for doing that

We will use personal information (or special categories of personal information) about you:

- For operational reasons, to maintain records and ascertain compliance with policies.
- To promote events where we use images and footage of you taken at an event.
- To ensure information security and to protect our networks/systems and personal information.
- For equal opportunities monitoring and to conduct statistical analysis.

We will only use your **personal information** when the law allows us to. Most commonly:

- Where we need to perform our contract with you, or to comply with a legal or regulatory obligation (e.g. our obligations to you as your employer under employment protection and health safety legislation).
- Where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests. Those legitimate interests include demonstrating compliance with legal, regulatory and corporate governance obligations, as part of investigations by regulatory bodies, or in connection with legal proceedings and requests, good employment practice and ensuring safe working practices.

We may also use your personal information in the following situations, which will be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

We may also process special categories of personal information about you as follows:

- In limited circumstances, with your explicit consent.
- Where we need to comply with a legal or regulatory obligation (e.g. our obligations to you as your employer under employment protection and health safety legislation).
- Where it is needed in the public interest, such as for equal opportunities monitoring, or where it is needed to assess your working capacity on health grounds.

## How long we retain information about you

We will only retain your personal information for as long as necessary for the purposes we collected it for. Once you are no longer a member of the Band, 100 Club or a Patron, we will record, keep, and securely hold the information provided as part of your application and during your engagement in our Human Resources files for a period of two years.

Retaining this information is necessary to meet our legitimate interests of maintaining work records and good working practice, for dealing with any legal claims and for meeting any legal, regulatory and/or governance obligations.

For those in paid roles, we will destroy your bank details within one month of the last date of your engagement. We will retain details of payments made through our payroll system will for 7 years after the date on which your engagement ends, in line with HMRC requirements.

## **Information we receive about you from other sources**

We work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them. We may also receive information if you have provided permission to other organisations to share it with us. Before providing permission to such third party organisations to share your personal information, you should check their privacy notices carefully. We may receive information from publically available sources (where possible) to keep your information up to date.

## **Who we share your information with**

We will share your personal data with our suppliers and service providers for the purposes set out in this privacy policy only. We may also share your personal data with a regulator or where the disclosure is required by law. We require those third parties to respect the security of your data and to treat it in accordance with the law.

Other than for the purposes communicated to you in this privacy policy, we will not share your personal information with any other third parties without your consent unless we are required to do so by law. Where disclosure to third parties is required by law, our legal basis for processing your information in this way is that it is necessary to comply with a legal obligation that we are subject to.

## **Retention of your personal information**

We will only retain your personal information for as long as necessary for the purposes we collected it for and for as long afterwards as is necessary to comply with our legal obligations or as is necessary in our legitimate interests to retain it. Therefore, some information may be kept for more or less time depending on how long we reasonably feel it is required for. We have provided information about our retention periods in relation to certain pieces of personal information above. We review these retention periods on a regular basis.

If you ask us to delete your information in accordance with your rights set out below, we will retain basic information on a suppression list to record your request and to avoid sending you unwanted materials in the future.

## **Law enforcement**

We fully co-operate with the police and other law enforcement agencies. We reserve the right to report to the police or any other such agencies any activities that we reasonably believe to be unlawful.

## **Linking to other websites**

Our website contain links to other websites which are not operated by us. We have no control over the contents of those sites or resources, and accept no responsibility for them or for any loss or damage that may arise from your use of them. The operators of other sites may collect information from you which will be used by them in accordance with their own data protection policy or privacy policy. This privacy policy applies only to our website. We are not responsible for the privacy practices within any other websites. You should always be aware of this when you leave our website and we encourage you to read the privacy policy on any other website that you visit.

## **Overseas transfers**

Your personal information may be transferred to, and stored in, countries outside of the UK and EU for the above purposes. We will take steps to ensure your personal information is adequately protected in countries outside of the UK and EU. Please contact us if you would like more details on safeguards used by us to protect personal information for these transfers.

## Your data protection rights

Data protection legislation in the UK and EU provides individuals with certain rights regarding the use of their personal information. If you would like to contact us to exercise your rights, please contact us using the contact details at the beginning of this privacy policy.

You have the right to:

- access the personal information that we hold about you in many circumstances;
- ask us to delete or correct any personal information that we hold about you;
- prevent us processing your personal information;
- port your personal information in certain circumstances;
- not be subject to a solely automated decision;
- withdraw any consent that you have given. This does not affect the lawfulness of processing based on consent before withdrawal; and
- lodge a complaint with the UK regulator, the Information Commissioner's Office, if you have concerns about how we use your personal information. Please see <https://ico.org.uk/concerns/> to find out more.

## Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.