

Privacy Policy

VERSION

1.0

ADOPTED

2026

REVIEW DATE

Annually

COMPLIANCE

UK GDPR / Data Protection Act 2018

1. Who We Are

The Midlands African Choir is a constituted voluntary community organisation based in Wellingborough, Northamptonshire. We are the data controller for the personal data we collect and process in connection with our activities.

Contact for data matters: Walson Mboe | themidlandsafricanchoir@gmail.com |
The Midlands African Choir, Wellingborough, Northamptonshire

This Privacy Policy explains what personal data we collect about you, why we collect it, how we use it, and your rights under UK data protection law (the UK General Data Protection Regulation and the Data Protection Act 2018).

2. What Personal Data We Collect

Depending on your relationship with the choir, we may collect and hold the following categories of personal data:

Data category	Examples	Who it relates to
Contact information	Name, email address, phone number, home address	Members, volunteers, contacts
Membership information	Date joined, voice part, attendance records	Choir members
Health information	Medical conditions relevant to participation or emergency response	Members (where disclosed voluntarily)
Emergency contacts	Name and phone number of a nominated contact person	Members
Images and recordings	Photographs and video recordings taken at rehearsals or events	Members, audiences, volunteers
Financial information	Bank details for reimbursements; records of any fees or donations	Members, donors
Communications	Emails, messages and correspondence with the choir	Anyone who contacts us

We do not collect sensitive personal data (such as racial or ethnic origin, political opinions, or biometric data) unless it is strictly necessary and you have given explicit consent.

3. How and Why We Use Your Data

We use your personal data only for legitimate purposes connected with the choir's activities. Our lawful bases for processing are:

- **Legitimate interests** — to manage membership, communicate with members about rehearsals and events, and operate the choir effectively
- **Contractual necessity** — where processing is necessary to fulfil obligations to members or volunteers

- **Legal obligation** — where we are required by law to process data (e.g. safeguarding referrals)
- **Consent** — for photography, marketing communications and any optional data collection where we ask for your permission

Specifically, we use your data to:

- Manage choir membership and communicate with members about rehearsals, performances and events
- Respond to enquiries from prospective members or members of the public
- Administer grant applications and fulfil reporting requirements to funders
- Promote our concerts and events (where you have consented to receive such communications)
- Ensure the safety and welfare of members at rehearsals and events
- Comply with our safeguarding obligations

4. Photography and Video

We may take photographs or video recordings at rehearsals, concerts and events for use in our communications, website and social media channels, and grant reporting. We will always ask for your consent before using an image or recording in which you are identifiable. You may withdraw consent at any time by contacting us, and we will remove your image from future use where possible.

For children and young people, we will always obtain written consent from a parent or guardian before taking or using any images.

5. Who We Share Your Data With

We do not sell, rent or trade your personal data. We may share your data with:

- **Grant funders** — we may be required to share anonymised or named data with funders (such as the National Lottery Community Fund) for reporting purposes, in accordance with grant conditions
- **Partner organisations** — where you have given consent and it is necessary to deliver a project or event

- **Statutory authorities** — including police, social services or the local authority, where we have a legal obligation to report a safeguarding concern
- **Our service providers** — such as email platforms or cloud storage providers, who process data on our behalf under data processing agreements

We will never share your data with third parties for marketing purposes without your explicit consent.

6. How Long We Keep Your Data

Type of data	Retention period
Active member records	Held while you remain a member and for 2 years after membership ends
Financial records	7 years (HMRC requirement)
Safeguarding records	Retained in line with statutory guidance — typically until the subject's 25th birthday or 8 years from the date of the incident, whichever is longer
Event photographs (consented)	Until consent is withdrawn or no longer relevant to choir activities
General correspondence	2 years from the date of the last communication

7. Your Rights

Under UK GDPR, you have the following rights in relation to your personal data:

- **Right of access** — to request a copy of the data we hold about you
- **Right to rectification** — to ask us to correct inaccurate or incomplete data
- **Right to erasure** — to ask us to delete your data where there is no longer a lawful reason to hold it

- **Right to restrict processing** — to ask us to limit how we use your data in certain circumstances
- **Right to object** — to object to processing based on legitimate interests
- **Right to withdraw consent** — where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing

To exercise any of these rights, please contact us at the address above. We will respond within one calendar month.

If you are unhappy with how we have handled your data, you have the right to complain to the Information Commissioner's Office (ICO) at **ico.org.uk** or by calling **0303 123 1113**.

8. Data Security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss or destruction. Member data is stored securely with access limited to authorised committee members only. We regularly review our security arrangements.

9. Cookies and Website

Our website may use cookies to improve your browsing experience. Where we use non-essential cookies, we will ask for your consent. You can adjust your browser settings to refuse cookies, though this may affect some website functionality.

10. Changes to This Policy

We may update this Privacy Policy from time to time. The most current version will always be published on our website. We will notify members of significant changes by email where possible.

The Midlands African Choir — Privacy Policy v1.0 | UK GDPR compliant

Review annually | Next review: 2027