

Privacy and Security Policy for the CBSO Benevolent Fund

Policy updated, signed and approved at AGM 25/06/20.

The latest version of this policy is available from www.cbsobenefitfund.org.uk or www.playerrep-s.co.uk.

Introduction

The CBSO Benevolent Fund is a friendly society (registered number 735F), whose members include past and present employees of the City of Birmingham Symphony Orchestra. Its Committee of Management is elected from and by its Active Members, that is, Members who are currently working for the orchestra. Members may claim benefits for reasons of health, hardship and death.

In this policy, "we", "us" and "our" refer to "the CBSO Benevolent Fund Committee of Management"; and "you" and "your" refer to "you as a Member of the CBSO Benevolent Fund". Words in the singular shall include the plural and vice versa.

The Fund itself is the Data Controller, and we appoint one of our Committee members as the Data Protection Officer. You can contact him or her at dpo@cbsobenefitfund.org.uk. The Data Protection Officer is responsible for compliance, security and your requests for access to your data.

The Data Processors are listed further down in this policy, detailing what category of data they can access.

Why this policy exists

This privacy and security policy ensures that we:

- comply with GDPR and follow good practice
- protect your rights
- are open about how we store and process your data
- protect ourselves from the risks of a data breach

What Data We Hold and Where It Is Stored

We hold two categories of personal data about you and your claims:

- Standard personal data (contact details and other data to process membership status and eligibility for benefits)
- Special Category data (i.e., details about your claims)

Standard personal data includes, that is not restricted to:

- Your full name, previous names, title, phone number, postal address and email address
- Date of Birth
- Gender
- Your section in the orchestra, or "Staff"
- Your membership status and dates of change
- Details of your benefit payments, including bank details and successful claim amounts
- Any information that is used to establish your right to a claim
- Any information that you have expressly or impliedly agreed to supply
- All eligibility criteria

Special Category personal data includes:

- Details of your claims, such as type, reasons, dates of sessions, our comments etc.

Our data is stored:

- In any jurisdiction permitted under the current United Kingdom legislation for the purpose of storing data.

Claims

Your data is stored in our online database kept by Zoho Corporation, on servers based in the European Union (or such other authorised countries as it is permitted to store data under the laws of the United Kingdom). The Treasurer stores all data pertaining to claims electronically in the same way. Zoho's GDPR guidance is here: www.zoho.com/gdpr.

Zoho gives us complete control of our service data. They are certified for industry standards ISO27001:2013 and SOC 2 Type II, and all customer data transmitted to Zoho's servers over public networks is protected using strong encryption protocols. Customer data at rest is encrypted using 256-bit Advanced Encryption Standard (AES). Zoho own and maintain the keys using an in-house Key Management Service (KMS) and provide additional layers of security by encrypting the data encryption keys using master keys. The master keys and data encryption keys are physically separated and stored in different servers with limited access. Additionally, they run full backups once a week with incremental backups every day, with restoration and validation backups every week. All backed up data is retained for three months.

Where information is conveyed to us on paper, we may retain that hard-copy in a secure filing system according to the information supplied. If appropriate, only restricted access will be permitted to this information.

When necessary, excerpts from the online database and any corresponding paper records will be stored at the office of our Auditor, who ensures their safety and integrity. Should the database need updating or repairing, it will be handled by the appointed IT adviser as a Data Processor under safe conditions.

Excerpts from the database containing only Standard personal data may be temporarily stored on computers belonging to all the Data Processors and shared with other Data Processors via a secure encrypted email or messaging service. Where it is necessary for advice to be sought, excerpts from the database may be transmitted to advisers.

Special Category personal data may not be transferred outside the boundaries of the permitted jurisdiction. Standard personal data might occasionally have to be transferred outside the permitted jurisdiction; for instance when using mail servers in the US or when communicating with Honorary (retired) Members living overseas. Otherwise, all data we collect is stored in a permitted jurisdiction in full compliance with GDPR.

In the event of a security breach, we will endeavour to inform all affected users, and when appropriate, the Information Commissioner's Office (ICO), as soon as possible; in any case, within 72 hours.

Minutes of meetings

Previous Minutes of Committee meetings may contain references to you, your claims and our discussions around it; after May 2018, no Special Category personal data was minuted - only Standard personal data where appropriate.

Committee Meeting Minutes now contain no direct references to any individual member; these have been replaced with either Member Codes or generalised wording. Minutes may be shared with other Data Processors using a secure encrypted email or messaging service.

Paper copies of the Minutes of past Committee meetings are kept in a locked filing cabinet, to which only the Data Processors have access. All electronic copies are stored in Zoho Docs.

Death Nominations

You can submit an online form where you express your wishes as to how your discretionary death benefit should be paid. This can be found in the Members area of the CBSO Benevolent Fund website, or please ask a member of the Committee for the paper version. You can submit a new form to alter or revoke your instructions.

Data Processors

The people who may have access to your data, grouped by access rights, are:

Access to the database, all data stored online and in hardcopy:

- The Data Protection Officer
- All members of the Committee of Management
- Our Auditor and Professional Advisers
- Our Regulatory Authorities
- Any law enforcement agencies and fraud prevention agencies when required by law

Access to the Zoho online system, but not to Special Category data:

- Any IT Adviser appointed by the Committee.

We usually publish the names of the people in those roles on our public website (www.cb-sobenfund.org.uk/contact-us) and on the Benevolent Fund page on the CBSO Player Reps' website (www.playerreps.co.uk/page20.php) as soon as they are elected or appointed. When applicable, these Data Processors are bound by this policy to ensure the privacy and security of your data. Special advisers are used from time to time, the names of whom are not pub-

lished. If they affect a given person, an application can be made by that person for the name of the adviser.

If you feel uncomfortable about the Data Processors listed above being able to connect you to your claims, you might consider using the Confidential Claims Procedure. Please contact the Treasurer or any other member of the Committee for more information.

Life of Your Data

We collect data about you when we consider the you may potentially be able to join the Fund or obtain a benefit from it (name, title, gender, orchestral section/staff, date of birth, contact number, postal and email address) and whenever you submit a claim form or apply for financial support (bank details and claims details etc). When you submit a claim form, you agree to our use of your data for the purposes described in this document. Where information is provided by a third party in connection with an actual or potential claim, this may also be stored.

With your consent, we may collect and update your email address from the CBSO Players' Website - you can manage that consent on their website at <https://playerreps.co.uk/cbso/page93.php>.

Your data will only be kept for the minimum time as required by the operation of the Fund and our duties to the Regulators. This is currently eight years from submitting a form. We may keep anonymised older data indefinitely on the database for statistical purposes. Claim forms older than eight years, whether online or on paper, will be destroyed.

Our Legal Bases for Processing Your Data

We hold your Standard personal data, such as your name, title, contact details, date of birth, eligibility details and details of your payments to communicate with you, to confirm your membership status and to determine how to process your claims. The legal basis for this processing is our legitimate interests, namely the proper running of the Fund.

We use other Standard personal data, such as your gender and section within the organisation, for statistical purposes, to improve our understanding of the needs of our Members. The legal basis for this processing is our legitimate interests, namely being able to act in the best interest of our Members.

We keep Special Category personal data, including details of your claims, to make sure we manage the Fund fairly and legally, and to produce annual accounts. The legal basis for this processing is our legitimate interests, namely the proper running of the Fund.

We publish the names and role-specific email addresses (for instance treasurer@cbsoben-fund.org.uk) of the Members of the Committee on our website and on our page of the CBSO Player Reps' Website. The legal basis for this processing is our legitimate interests, namely enabling you, the members of the Fund, to communicate with us.

If you wish to recommend a practitioner to us, please contact a member of the Committee. With your consent, your name may be displayed so that other members of the Fund and visiting artists can ask you questions about your recommendation. The legal basis for this processing is your consent. If you would like to withdraw this consent, please contact the Committee.

Your Rights

We give you access to your personal data, rectify or delete any personal data that is wrongly held or erroneous (if consistent with our obligations), on your request as soon as possible within one month. Please contact the Secretary for such requests, on secretary@cbsoben-fund.org.uk.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you should notify us within seven days as to why you are not satisfied with the response and what you wish us to do to rectify the situation. You can also complain to the Information Commissioner's Office (ICO).

In order to ensure accuracy of data, it is essential that you notify us immediately of any change in your circumstances, including changes of address. If you are signed up to the Member's Area of the website, it is your obligation to ensure that your password is kept confidential, and to inform us of any situation whereby the password may be compromised.
