

Data Protection Policy

Effective Date: 22nd September 2026 **Next Review:** 22nd September 2026

1. Purpose

Musicrange is committed to ensuring that all personal data we hold is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy sets out how we collect, handle, store, and protect personal data, ensuring that all staff (from this point forward, the word 'staff' is taken to include self-employed individuals), volunteers and trustees understand their responsibilities.

2. Scope

This Policy applies to:

- Trustees
- Staff self-employed, permanent, fixed-term and temporary
- Volunteers
- Any other individual processing personal data on behalf of Musicrange.

This Policy covers all personal data held electronically, on hard copy or otherwise.

3. Definitions

Personal Data: Any information relating to an identified or identifiable I

individual

• Special Category Data: Sensitive personal data (e.g., health information, racial

or ethnic origin)

Data Controller: Is Musicrange and determines how and why personal

data is processed

Data Processor: Any person or organisation processing data on behalf

of Musicrange

Processing: Any operation involving personal data – including

collection, storage, use and deletion

Data Subject: A living individual who can be identified, directly or

Indirectly, from personal data held by and organisation

4. Data Protection Principals

Musicrange will ensure that personal data is:

- Processed lawfully, fairly and transparently
- Collected for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained for no longer than necessary
- Processed securely to protect against unauthorised or unlawful processing, loss or damage.

5. Responsibilities

• Trustees: Overall responsibility for compliance with Data Protection

legislation

• Staff and Volunteers: Must understand and follow this policy and undertake relevant

training.

6. Data Collection and Use

We only collect personal data that we need to carry out our activities and fulfil our charitable aims, including:

- Contact information for participants, donors, and volunteers.
- Health and emergency contact information where necessary.
- Financial data for processing donations or payments.

We will inform individuals at the point of collection about:

- What data we collect.
- Why we collect it.
- How it will be used and stored.
- Their rights.

7. Consent and Legal Basis

Where consent is the basis for processing personal data, it will be:

- Freely given.
- Specific and informed.
- Clearly recorded.

Other lawful bases may include:

- Contractual necessity.
- Legal obligations.
- Legitimate interests (where these do not override individual rights).

8. Data Security

We are committed to keeping personal data secure by:

- Using secure password-protected systems and encryption.
- Restricting access to personal data to authorised individuals only.

- Storing paper records securely and disposing of them securely when no longer needed.
- Conducting regular reviews of data security measures.

9. Data Sharing

We will not share personal data with third parties unless:

- We have obtained consent.
- It is required by law.
- It is necessary to fulfil a service (e.g., payment processors, event registration platforms).
- All third-party processors must provide assurances of GDPR compliance.

10. Data Retention

Personal data will only be retained for as long as necessary for the purpose for which it was collected.

We will implement a Data Retention Schedule and securely delete or anonymise data when it is no longer needed.

11. Data Subject Rights

Individuals have the right to:

- Access their personal data.
- Request correction or deletion of their data.
- · Object to or restrict processing of their data.
- Withdraw consent (where applicable) of their data being used or retained.
- Lodge a complaint with the Information Commissioner's Office (ICO).

Requests will be responded to within one month.

12. Data Breach Reporting

In the event of a data breach:

- Immediate steps will be taken to assess and contain the breach.
- If necessary, the breach will be reported to the ICO within 72 hours.
- Affected individuals will be informed where there is a high risk to their rights and freedoms.

13. Contact Information

For data protection queries or to exercise your rights:

Contact: Data Protection Officer email: privacy@musicrange.org.uk

Alternatively, you can contact Musicrange using the details provided in the footer of this document.

14. Legal Framework

This policy aligns with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Data Use and Access Act 2025 (DUAA)
- Information Commissioner's Office (ICO) Guidelines

15. Changes to this Policy

We are committed to reviewing this Policy annually or sooner, if necessitated by a change in legislation, best practice or organisational needs.

567 Holburn Street Aberdeen, AB10 7LH www.musicrange.org.uk t: 01224 958266

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