



**KILBARCHAN PIPE BAND**  
**Charity no SC045878**  
**Data Protection Policy**

## 1. Overview

1. This policy explains the provisions that Kilbarchan Pipe Band (KPB) will undertake when processing personal data.
2. We expect everyone processing personal data on behalf of the band to comply with this policy in all respects.
3. The band has a separate Privacy Notice which outlines the way in which we use personal information. A copy can be obtained from the webpage or Secretary.
4. Personal data is information about a person which is identifiable as being about them; any information relating to an identified or identifiable natural person ('data subject').
5. According to the European Commission; processing covers a wide range of operations performed on personal data:
  - Including by manual or automated means.
  - Includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, reassurance or destruction of personal data.
6. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when processing personal data.

## 2. RESPONSIBILITY

Everyone who processes data on behalf of the band has responsibility for ensuring that the data they process is handled appropriately, in line with this policy and our Privacy Notice.

## 3. GENERAL PROCEDURES

1. KPB will retain personal data only for the duration of a data subject's membership. Certain data may be retained post membership including for certain legal, financial, record keeping and reporting purposes and registration information for the Royal Scottish Pipe Band Association. Personal data includes name and contact details (e mail, telephone number and address), usage of social media platforms, the band's website, videos and photographs, electronic messaging and other written or electronic material such as meeting minutes, data necessary for the management of the band (such as, OSCR requirements, financial and contractual arrangements, Protection of Vulnerable Groups, Health and Safety etc).

2. KPB needs to keep personal data about its members and generally people we are in contact with.
3. We will only collect, store and use data for:
  - purposes for which the individual has given explicit consent, or
  - purposes that are in the band's legitimate interests, or
  - contracts with the individual whose data it is, or
  - to comply with legal obligations, or
  - to protect someone's life, or
  - to perform public tasks.
4. Personal data must:
  - Be processed fairly, lawfully and transparently.
  - Be collected and processed only for specified and legitimate purposes.
  - Be adequate, relevant and limited to what is necessary for the purposes for which it is processed.
  - Be accurate and kept up to date.
  - Not be kept longer than is necessary
  - Be processed securely

Additionally:

- Personal data should only be accessed by/shared with authorised individuals and used for the purposes for which it is processed.
  - Data should be disposed of securely (e.g. shredding) when it is no longer needed.
  - Unnecessary copies of personal data should not be made.
  - 'Bcc' fields should be used for emails, unless everyone has consented to email addresses being shared among the group.
  - Hard copy data should be held under lock and key
  - Electronic data should only be stored on password protected encrypted removable storage devices and backed up.
  - Passwords should be strong (at least 15 characters containing upper and lower case letters, numbers and special characters)
  - Personal data transferred electronically should be password protected and encrypted where possible
  - Computers, tablets, mobile devices etc used must have appropriate firewall and anti-virus software installed where possible
5. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
  6. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Should a data breach occur, the secretary will notify the Chairman **immediately**. If the breach is likely to result in a risk to the rights and freedoms of

individuals, then the Information Commissioner’s Office and OSCR must be notified within 72 hours, and the individuals concerned notified.

7. Individuals have a number of rights under the Regulations including the right to request what information is held about them and also to request removal, and rectification of their personal data.

Data subjects can make a subject access request to find out what information is held about them or to raise and complaint. Requests must be made in writing to the band Secretary . Requests received should be forwarded immediately to the Secretary who will coordinate a response within the necessary time limit (30 days).

#### 4. REVIEW

The Committee will be responsible for reviewing this policy every 3 years.

Additional information can be found at:  
[www.ico.org.uk](http://www.ico.org.uk)

Date.....

Signature (Chair).....

Signature (Secretary).....