**Privacy Policy**

**Who we are and what we do**

As a registered Data Controller, the Manx Competitive Music, Speech and Dance Festival is a Company (Registration Number 127818C) and Charity (number 1127) with the following charitable purposes:

1. To foster, develop and promote in the Isle of Man the performing arts of music, dance and speech in all its forms
2. To provide competitions for the performance of music, dance and speech in all its forms and to hold or support amateur festivals of such performing arts.

The Company Secretary is the appointed Data Protection Officer for the charity.

**Data Protection Principles**

The Charity is committed to processing data in accordance with its responsibilities under the General Data Protection Regulations:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality

together with the overarching principle of accountability which requires a controller to demonstrate compliance with the personal data processing principles. This includes the implementation of appropriate data protection policies under the responsibility of the controller set out in Article 24 of the Applied GDPR.

For further details on these principles go to the Office of the Information Commissioner <https://www.inforights.im/organisations/data-protection-law-2018/principles-of-data-protection/>

**What do we do with your data?**

The data we collect from you and our partners will be used exclusively in connection with our charitable purposes.

We collect the contact details of stewards, Company Members, employees, entrants, subscribers, trophy winners, teachers, accompanists, sponsors, partners and advertisers. In addition we collect the bank details of those to whom we make payments. We retain this information for only as long as required to achieve the Festival’s purposes.

The names of competitors will be included in the Festival’s Official Programme which is on public sale. No contact details or dates of birth will be included there although competitors entered in classes for specific age groups will be identifiable as of that age group.

The data collected will not be shared with third parties without the express permission of the data subject. When the Festival is asked to provide contact details to any third party, (for example, with a view to asking a competitor to perform at an event), the Secretary will contact the competitor to ensure their consent to contact details being disclosed. Any performances recorded in connection with the Festival will only be shared with the consent of the performer and, in the case of a person under 18, by their parent or teacher. Consent for broadcast on Manx Radio is given in the application process.

This Privacy Policy will be drawn to the attention of all entrants, stewards, accompanists, partners, adjudicators, teachers, subscribers and Company Members and will be on our web site.

Our Privacy Policy has been developed in line with the Isle of Man Data Protection Act 2018. International entries will be treated under Manx law.

**Your rights**

If you are concerned about the way your personal data is being collected, retained or used, you have the right to have it deleted if you wish. If you wish to know what data we have about you then you should contact the Festival Secretary on manxguild@gmail.com who will acknowledge receipt and provide all the relevant data within one month of receipt of the request.

**Breach Policy**

If there is accidental or unlawful restriction, loss, alteration or unauthorised disclosure of, or access to, personal data held by us it will be investigated by the Vice Chairman and Treasurer. It will be reported where appropriate to the Information Commissioner and, where appropriate and legal, to the individuals concerned.

**Data collected**

We collect and retain the following data:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Who** | **What data?** | **How we collect** | **How long we keep** | **Where it is retained** |
| Stewards | Name, address, email address, phone number and car registration.  | Availability Form. We seek agreement for contact details to be shared with other stewards so that cover arrangements can be made.  | We keep stewards’ names and email addresses from year to year so that they can be invited again. The rest is shredded.  | Festival Secretary’s home office. |
| Company Members | Name, address, email address, phone number and car registration | Initial application form and personal request for email address and phone number.  | For as long as the person is a Company Member  | Company Secretary’s home office. |
| Employees | Name, address, phone number, car registration, bank details, N.I. and tax numbers.  | Initial application form for Company Membership and personal request for other information.  | For six years after ceasing employment.  | Company Secretary and Treasurer’s homes |
| Entrants completing form (a.k.a. Primary Contact) | Name, address, email address, school (where relevant) and phone number. | Paper or on line entry forms | All previous years shredded. Current year kept in case of queries. Database record maintained to ensure a record is built of each individual competitor’s involvement in the Festival.  | Entry Secretary’s home. Entered onto database viewable by Entries Secretary, Festival Secretary and Company Secretary. |
| Entrants entered by others | Name, date of birth and school/place | On paper and on line entry forms | All previous years paper forms shredded. Current year kept in case of queries.Database record retained for historical recording purposes.  | Entry Secretary’s home. Entered onto database viewable by Entries Secretary, Festival Secretary and Company Secretary. |
| Subscribers | Name and address/email address | Long established list. Few new additions each year.  | Indefinitely.  | Retained by one Company Member and one Director at their homes.  |
| Trophy winners | Name, address, email and phone numbers | Collected immediately after the class from winner, parent or teacher as appropriate. Consent given by implication. | One year. Previous year’s information redacted prior to next Festival.  | Retained at their homes by the two trophy monitors and in a secure office |
| Teachers | Names, addresses and email addresses | Collected from application forms and in line entries | Indefinitely | Retained by Entries Secretary in electronic form |
| Accompanists | Names, addresses, email addresses and bank details | All except bank details passed from Festival Secretary to Festival Secretary. All confirmed plus bank details to be added on annual claim form. | Indefinitely | Retained by Festival Secretary in electronic form  |
| Adjudicators | Names, addresses, email addresses and bank details | Obtained from BIFF Handbook  | Not retained after the Festival they adjudicate at.  | Not stored |
| Sponsor and partners | Name, company address and email addresses of Director of Marketing and marketing staff | Provided in contracts | Retained for the duration of the partnership arrangement. | Retained at Festival Secretary’s home in electronic form |
| Advertisers | Contact name, company address and email | Gathered in the annual round of gathering advertisers for the Syllabus and Programme.  | Retained until subsequent year to provide a starting point for the next year’s advertiser gathering exercise.  | Retained by Company Members processing requests for advertising.  |
| Media partners | Contact name, company address and email | Intermittent contacts and via IOM Advertising | Retained indefinitely | In electronic mailing lists for Press and PR purposes |

*Reviewed May 2020. Next review date May 2022*