

MKCO Privacy Policy

Effective: 25 May 2018

The Milton Keynes City Orchestra (MKCO) is a professional freelance orchestra providing a first-class listening and visual experience for audiences at every stage of classical music appreciation.

The orchestra is also dedicated to the delivery of a relevant and innovative education and outreach programme, working closely with partners in education, the arts and charities that have similar goals and ambitions within the community.

In the pursuit of our mission we interact with members, supporters, volunteers and other organisations. This interaction requires the storing and processing of personal data.

This Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the General Data Protection Regulation 2018, and the Privacy and Electronic Communications Regulations 2003.

Who we are

MKCO is limited company and a registered charity. Our income comes from commercial work and concert engagements, grants, ticket sales, sponsorship, individual donations and trusts and foundations.

This privacy policy is provided on behalf of MKCO Limited, a company limited by guarantee (registration number 1268436) and a registered charity (charity number 271108). Our registered office is Sovereign Court, 230 Upper Fifth Street, Central Milton Keynes, MK9 2HR.

Information About Your Personal Data

"**Personal Data**" is information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as your full name, email address, phone number, and home address.

MKCO collects, uses, and processes Personal Data, as outlined in this Privacy Policy, to fulfil its core function and to provide services to members of the public, Patrons and Friends, as further described in this Privacy Policy.

How We Collect and Use Personal Data

We collect your Personal Data in a number of ways, including:

- When you buy tickets for a concert organised by the orchestra;
- When you become a Patron or Friend of the orchestra;

- When you act as a deputy for an orchestral player;
- When you contract with the orchestra to provide services;
- When you sign up to receive promotional materials;
- When you participate in special activities, offers, or programs;
- When you engage with our online communities or advertising;
- When you connect with us through social media.

We use your Personal Data to communicate with you on various issues including concert and rehearsal details, orchestra operational matters, information on upcoming concerts or other events, and contract requirements.

Our privacy and data principles

We are committed:

- To provide **clear, honest and open** information about how we use your data
- To give you the **choice** about how we use your data
- To use your data **appropriately** and in a way that would be reasonably expected by you
- To treat our supporters and donors with respect.
- To only share your data with other organisations where you have given your **consent** for us to do so, or where we need to do so in order to fulfil our contract with you
- To be **accountable and responsible**: to take active steps to **protect** your data from harm, and to have separate and **enhanced procedures** for the use of sensitive data (such as data relating to under-18s or disability)
- To ensure our **staff** and **partners** (including suppliers and artists) understand these principles and their responsibilities in delivering them.

What information do we collect?

Buying tickets and making donations:

We store securely the information you give us when you buy a ticket or a membership, sign up for one of our events, make a donation or gift aid declaration, or communicate with us.

This may include:

- Name
- Postal address
- Telephone number(s)
- Email address
- Ticketing history
- Billing/payment information (we do not store your credit card details, except to process direct debits where applicable)
- Donation history
- Communications preferences
- Access requirements

- Information acquired via Cookies on or website
- Qualitative opinions or attitudes about our services and programme through surveys
- Other feedback (e.g. complaints or compliments) you choose to send us

Email, Web Activity and Social Media:

We keep a record of the emails we send you, and we may track whether you receive or open them so we can make sure we are sending you the most relevant information. We may then track any subsequent actions online, such as buying a ticket.

Like most organisations, we receive and store certain details whenever you use the MKCO website. We use “cookies” to help us make our site – and the way you might use it – better. Cookies mean that a website will remember you and enable online transactions. It also helps us understand how you use our website, where we can make improvements and how best to tell our audiences about events they might be interested in, through recommendations on our own site, or adverts elsewhere on the internet.

Information available Publicly:

This may include information regarding directorships or positions held on Trustee/governing boards found in places such as Companies House, the Charity Commission for England and Wales, your biography on your work website or LinkedIn, or as well as on other charity and arts organisations’ websites.

Sensitive data:

Any data regarding under 18s, disability or medical need, religion, political affiliation, sexuality or ethnicity is regarded as sensitive, and we take steps to ensure that any such information is only collected where necessary, is subject to enhanced security measures, used only for the purposes agreed, and erased when no longer necessary.

Details of payment card numbers and expiry dates etc. go through a secure server operated by our payment service provider, and to which the MKCO does not have direct access. We do not keep your payment information for any purpose, except in order to process direct debits, the data for which are securely held.

What do we use your personal information for?

We aim to be open and transparent when we collect your personal data and we will not do anything you would not reasonably expect.

We will use your personal information to:

- Provide information you have asked us for.
- Make offers and complete orders of goods and services.
- Process donations that you make to us and keep you informed of how your donations are used to help the orchestra.

- Notify you of any changes to events or services, including our concerts and membership schemes, which may be relevant to you.
- Keep a record of your relationship with us.
- Analyse your personal information to create a profile of your interests and preferences so that we can contact you with information most relevant to you.
- Ask you to participate in surveys and market research.
- Improve our understanding of our audience through basic profiling, tracking of your activity on our website and your response to emails (or other communications) that we send you.
- Combine information you provide to us with information available from external sources, in order to gain a better understanding of our audiences, visitors and supporters. This helps us to make appropriate requests to customers and supporters who may be able and willing to give more than they already do. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.
- Personalise adverts on social media that are tailored to your interests (depending on your settings or the privacy policies on social media and messaging services like Facebook, Twitter and Instagram, you might give third parties like the MKCO permission to access information from those accounts or services).

Legal Basis for Processing

This section addresses the legal basis for processing your data.

For the purposes of applicable data protection laws, MKCO is the controller of the Personal Data you provide to us ("Data Controller"). As a Data Controller, we process the Personal Data we maintain about you in accordance with this Privacy Policy. If you have any questions or concerns regarding the processing of your Personal Data, or if you have questions regarding this Privacy Policy, please contact our data protection officer, who can be contacted at richard.millard@mkco.org. We will respond to any reasonable requests promptly.

Fulfilment of a legal obligation

We may use your Personal Data for the purpose of fulfilling a legal obligation under a contract where you have purchased tickets or made a donation, or become a Patron or Friend of the orchestra.

Consent as a Basis for Processing

In some cases, we will ask for your consent to process your Personal Data. You may indicate your consent in a number of ways, including, as permitted by law, ticking a box (or equivalent action) to indicate your consent when providing us with your Personal Data in a form.

Withdrawing Consent

You may at any time withdraw your consent with future effect and without affecting the lawfulness of processing of your Personal Data based on the consent you provided before you withdrew it. To do so, please contact our Data Officer at richard.millard@mkco.org and we will respond to any reasonable requests as quickly as possible.

Legitimate Interests as a Basis for Processing

We keep a record of your relationship with us so that we may communicate with you to keep you informed of future concerts, events, fundraising campaigns and to provide you with the most relevant information to you about MKCO. We have a legitimate interest in processing your personal data in order to deliver our objectives for the benefit of Milton Keynes and the wider area and persons that enjoy classical music. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to stop us sending you promotional communications at any time by withdrawing your consent (see above) or by using the 'unsubscribe' link in emails or 'STOP' number in texts

For members of the orchestra, soloists, conductors and deputies, we hold and process your data based on the Legitimate Interests criteria and/or fulfilment of a legal obligation. We use Personal Data to communicate with you about orchestra activities e.g. arranging rehearsals and concerts, sharing music.

Sharing your information

We will not share any personal details with any other third parties without your agreement, unless required in order to fulfil our contract with you, or allowed by law.

In general, the third-party providers used by us to fulfil our contract with you will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. These providers include our Ticketing Systems providers, Payment services, Email and Mail distribution services.

How long do we keep your personal details?

The personal data collected by the MKCO is evaluated periodically to determine whether it is current and still needs to be held.

Data is held by us for as long as is legally or practically necessary for our business. Once that period of necessity has passed, we have a regular programme of data suppression and deletion. This ensures that your data is not held indefinitely on our systems.

Subject to any legal retention requirements (e.g. VAT regulations require appropriate financial records to be retained for six years, Gift Aid regulations require appropriate

records to be retained for seven years), you may notify MKCO if you do not wish your data to be held.

Keeping your details safe and secure

We implement appropriate technical and organisational safeguards to protect against unauthorised or unlawful processing of Personal Data and against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

Your data is always held securely. Access to customer information is strictly controlled, and can only be accessed by people who need it to do their job, or third parties we contract to process the Personal Data for the purposes stated in this policy.

All information received by us is retrieved using secure technology. In order to provide a safe and secure environment for your personal information we use up to date technology with a view to protecting that information against loss, misuse or unauthorised alteration.

Receiving fundraising communications

MKCO is a registered charity and we rely on generous philanthropic donations from our supporters. We are committed to treating our donors with respect.

We encourage you to opt-in to receive information about ways to show your support to the MKCO.

We may send you information about our fundraising appeals, events and high-level memberships. To identify whether or not these might be suitable, we may look at your ticket history, if you have made a donation in the past, if your name has been suggested by a current supporter, or a volunteer member. We will only send these when we feel they would be relevant and of interest to you. If you would prefer not to receive any information about our fundraising activities, please be in touch using the contact details at the end of this policy.

Giving you control

What if I want to check what information you hold on me?

Under the current law you have certain rights (for example the right to withdraw your consent so that we don't keep your information any more, or to ask what information we have about you - all the rights are listed on the Information Commissioner's Office website). Our Data Officer can be contacted on richard.millard@mkco.org and we will respond to any reasonable requests as quickly as possible.

Withdrawing Consent

You may at any time withdraw your consent to receiving information by email or post and without affecting the lawfulness of processing of your Personal Data based on the consent you provided before you withdrew it. To do so, please contact our Data Officer at richard.millard@mkco.org and we will respond to any reasonable requests as quickly as possible

If you have opted out of marketing communications, we may still get in touch with you regarding your booking. For example, we may email you to give you important information about the event you've booked for with any changes that affect you.

Your Rights

You have certain rights related to your personal data, which are outlined [here](#). These include:

- The right to request a copy of personal information held about you
- The right to request that inaccuracies be corrected
- The right to request us to stop processing your personal data
- The right to lodge a complaint with the Information Commissioner's Office or Fundraising Regulator

Contact Us

We value and appreciate our relationship with you and the support you have given to MKCO over the years and we look forward to your continued support going forward. Please contact us if you have any questions about how your data is used, wish to be removed from any communications or data processing activities, or employ any of the rights listed above.

Email us richard.millard@mkco.org

Call us on 01908 684116

Or **write to us** at: Milton Keynes College, Woughton Campus West, Leadenhall, Milton Keynes MK6 5LP

For the purpose of the Data Protection Act 1998, the data controller is Richard Millard, Company Secretary and Director, MKCO Limited.