

## Privacy notice

Version 1.0 approved by CoMA Board on 1 October 2018.

### What is this guide for?

Whenever we need to collect any of your data, we will let you at that point *why* we need to do so and *what* it will be used for, but this guide provides a useful overview of all of those situations and provides more detail on how we keep your data secure and up to date, how long we might hold it for, and what your rights are in relation to it.

CoMA is committed to protecting your personal data and will use any personal or sensitive data we collect from you in line with the General Data Protection Regulations (GDPR).

### Who's responsible for data CoMA collects?

CoMA is a Data Controller under the GDPR. CoMA's Data Protection Officer is Mick Kahn who can be contacted at [marketing@coma.org](mailto:marketing@coma.org).

### What data do we collect and what do we use it for?

CoMA collects data from individuals to help us plan, organise and run the day-to-day operations of CoMA (e.g. co-ordinating events or collecting Friend's membership fees) and to promote and market CoMA's activities (e.g. marketing mailing lists and photography/video capture).

#### Friends: for administering membership

When you join CoMA as a Friend, or during your Friends membership with us, we may need to collect some of the following information on you:

<ul style="list-style-type: none"><li>• Name</li><li>• Email address</li><li>• Phone number</li><li>• Address</li><li>• Emergency contact details</li><li>• Medical information</li></ul>	<ul style="list-style-type: none"><li>• Dietary needs/preferences</li><li>• Gift Aid Declarations</li><li>• Age/gender</li><li>• DBS checks</li><li>• Bank details</li><li>• Photos/video footage</li></ul>
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This data will be used by staff and volunteers to manage your Friends membership with CoMA and to organise and run our activities.

If you give us your consent to do so, we may also use your contact details to send you marketing/promotional communications from CoMA.

Any marketing/promotional communication we send you will include a clear option to withdraw your consent (e.g. to 'opt out' of future emails) and you can also withdraw consent at any point by contacting the Data Protection Officer.

#### Event attendees: for processing and managing tickets for events

Where our events are ticketed, we need to collect data on the person booking (name and email) in order to allow you access to the event and to send you a confirmation of your reservation/purchase. This data will only be used for administering your access to the event/s for which you have booked and will *not* be used to send you marketing/promotional messages from CoMA unless you have also provided your consent to receive these (see below).

#### Employees and contractors: for administration and legal/regulatory purposes

We may need (for administration or for legal/regulatory reasons) to collect personal or sensitive data on employees or contractors of CoMA. Where this is the case, we will explain what this is for at the point of collection.

## **Mailing list subscribers: for marketing and promotion**

We offer everybody the opportunity to sign up (consent) to receive marketing and promotional information on CoMA's activities (e.g. emails about forthcoming events).

When you sign-up to our marketing mailing list we will ask for your name, email, phone number, address and will use this data to send you information about our events and activities (e.g. forthcoming performances, social events and fundraising events). We may also ask for your preferred topics and communication methods. These allow us to tailor the information we provide to suit your preferences (e.g. email vs post).

We will *only* send you information that is related to CoMA (e.g. we will *not* use your data to send you marketing messages from 3<sup>rd</sup> parties).

Anything we send you will include a clear option to withdraw your consent (e.g. to 'opt out' of future emails) and you can also do so at any time by contacting the Data Protection Officer.

## **Website visitors: for running and improving our website**

We use cookie technology when a person visits our website to collect and analyse *anonymised* data on how many people have visited, what pages they have looked at and other statistical information. We also use cookies to allow members to log in and out in order to view our members-only section.

We use a pop-up banner to let users know about this on their first visit, and they can at any time disable cookies in their browser if they do not wish their (anonymised) data to be tracked.

You can find out more about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Do we share your data with anyone else?**

If (and only if) you give consent, we may pass your details to related third parties, so they can contact you about their activities.

We sometimes use third party services to process your data. We will always make sure any third parties we use are reputable, secure, and process your data in accordance with your rights under GDPR.

## **Are there special measures for children's data?**

Where we knowingly collect or store data of children under 13 we will ensure the person with parental responsibility for the child has seen the relevant information relating to the child data or has given consent on behalf of the child.

Once a child is over 13 years old, parental consent to use their data will no longer be sufficient. We will only continue to hold/use the data if the child *themselves* also gives their consent.

## **How can you update your data?**

You can contact us at any time at [info@coma.org](mailto:info@coma.org) to update or correct the data we hold on you.

## **How long we will hold your data?**

The CoMA data retention policy is to review all data held on individuals at least every two years and remove data where we no longer have a legitimate reason to keep it.

Where you have withdrawn your consent for us to use your data for a particular purpose (e.g. unsubscribed from a mailing list) we may retain some of your data for up to two years in order to preserve a record of your consent having been withdrawn.

## **What rights do you have?**

Under the GDPR, you have the following rights over your data and its use:

- The right **to be informed** about what data we are collecting on you and how we will use it

- The right of **access** - you can ask to see the data we hold on you
- The right to **rectification** - you can ask that we update or correct your data
- The right to **object** - you can ask that we stop using your data for a particular purpose
- The right to **erasure** - you can ask us to delete the data we hold on you
- The right to **restrict processing** - you can ask that we temporarily stop using your data while the reason for its use or its accuracy are investigated
- Though unlikely to apply to the data we hold and process on you, you also have rights related to **portability and automated decision making** (including profiling)

All requests related to your rights should be made to the Data Protection Officer. We will respond within one month.

You can find out more about your rights on the [Information Commission's Office website](#).

## What will we do if anything changes?

If we make changes to our privacy statements or processes, we will post the changes at [www.coma.org/terms-and-conditions](http://www.coma.org/terms-and-conditions). Where the changes are significant, we may also choose to email individuals affected with the new details. Where required by law, we will ask for your consent to continue processing your data after these changes are made.

# Use of Cookies

## What are 'cookies'?

'Cookies' are small text files that are stored by the web browser on your computer or electronic device. They allow websites to 'remember' you for a period of time so that they can store things like user preferences and make the website quicker and easier for you to use.

Without cookies, some things on websites would not be able to work: for example, without cookies it might not be possible to know whether or not you are logged in on a website, which would prevent you from being able to see content restricted to logged-in users.

## How does the CoMA website use cookies?

A visit to a page on the CoMA website may create the following types of cookie:

- Registration and preferences cookies
- Anonymous analytics cookies

## Registration and preferences cookies

When you register with CoMA, we generate cookies that let us know whether you are signed in or not. Our servers use these cookies to work out which account you are signed in with, and if you are allowed access to a particular service. It also allows us to associate any comments you post with your username. If you have not selected 'keep me signed in', your cookies get deleted when you either close your browser or shut down your computer.

## Anonymous analytics cookies

Every time someone visits our website, software provided by other organisations (Google Analytics and WordPress) generates an 'anonymous analytics cookie'.

These cookies can tell us whether or not you have visited the site before and what pages you visit. Your browser will tell us if you have these cookies and, if you don't, we generate new ones. This allows us to track how many individual users we have, and how often they visit the site. We use them to gather statistics, for example, the number of visits to a page, to help us identify if visitors would benefit from more information on a particular area.

## How do I turn cookies off?

It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies from a particular website.

All modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser. To understand these settings, the following links may be helpful, or you can use the 'Help' option in your browser for more details.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)

Please note: switching off cookies may prevent some aspects of our website from working fully (e.g. you may not be able to access our Fiends-only pages).

## Useful links

You can find out more about cookies and their use on the internet from [www.allaboutcookies.org](http://www.allaboutcookies.org)