

HPP Privacy Policy [v2023.1]

Purpose and function. Horsham Performers Platform (hereafter “HPP”, “we”, “us”, “our”) exists to advance the musical education of the public. We provide a performance platform for amateur musicians, incorporating adjudication from professional musicians.

HPP is a registered charity (Registered Charity Number 1176489). Our registered address is HPP, c/o 32 Billingshurst Road, Broadbridge Heath, Horsham, West Sussex, RH12 3LW.

We take great care to preserve your privacy and to safeguard all personal data we hold about you. This Privacy Policy explains how we may collect and use your personal data.

Personal data collected. We may collect from you the following personal data:

- your name,
- address,
- date of birth,
- telephone number,
- email address,
- bank account details.

Personal data usage. We may use your personal data for the following purposes:

- processing your festival entry forms and subsequently updating you about those entries,
- printing your name in the festival programme, if you are due to perform in the festival,
- providing you with festival news and information about future festivals, including the festival syllabus,
- responding to your general enquiries and handling any concerns or complaints you may raise,
- presenting your name or/and photo on our website or/and social media,
- processing any donations you may make,
- acknowledging and announcing your sponsorship of the festival, if you choose to sponsor it,
- processing any application you may make for an operational or administrative role within the festival or for membership of our committee or other governance role.

Explicit consent. For some of the purposes listed above, we will process your personal data only with your explicit consent to do so for that purpose. This sub-list includes, but is not necessarily limited to:

- providing you with festival news and information about future festivals, including the festival syllabus,
- presenting your name or/and photo on our website or/and social media,
- acknowledging and announcing your sponsorship of the festival, if you choose to sponsor it.

We may not seek your explicit consent to process your personal data for the other purposes listed, which are both essential to our operation (under the lawful basis of legitimate interest) and for which it is reasonable to expect your personal data to be processed. Nevertheless, we will consider your rights and interests and will not process your personal data for some such purpose if we feel that you would not reasonably expect us to process your personal data for it, or some mitigating circumstance becomes known to us which suggests better not to process your personal data for it.

Personal data safeguarding. We implement appropriate physical, technical and organisational measures to safeguard your personal data from improper access, use, alteration, destruction and loss.

In the course of exercising several of the aforementioned purposes which need your personal data, we may send you emails. Email is not a completely secure means of communication. While we do our utmost to keep our systems and communications secure, we cannot guarantee that emails will be completely secure.

Our website may contain links to other websites. While we try to link only to websites which share our high standards and respect for privacy, we accept no liability for the content on, nor for the privacy practices employed by, other websites. They may have their own privacy policies, and we encourage you to read those policy documents or to contact their operators directly to understand how your personal data are used by them.

Personal data sharing. We will never share your personal data with any third party, except:

- with His Majesty's Revenue & Customs, to reclaim Gift Aid on any donation you make and declare Gift Aid for;
- by law or court order.

We will never sell your personal data.

We do not buy any personal data.

Personal data retention periods. We will not hold your personal data for any longer than is necessary in relation to the purposes for which it was originally collected, or for which it was further processed, subject to certain statutory obligations (stated below). Our personal data retention periods are data-category-specific, and are as follows:

- festival entry forms and other data pertaining to entries: 24 months after the end of the relevant festival;
- subscriptions to emails for festival news and about future festivals: recipients may unsubscribe at any time from our mailing list;
- legacies and donations: 5 years after the legacy or donation is received;
- employment with, volunteering with, or governance of, the festival: 5 years after end of tenure.

We are legally required to hold some personal data for the duration necessary to fulfil our statutory obligations, including:

- for reclaiming Gift Aid from, and reporting Gift Aid declarations to, HMRC;
- for financial auditing and reporting.

Cookies. A cookie is a small file which the website instructs the web browser to store on the host computer, or other hardware device running the web browser, if the user agrees to it. They have several purposes, by which they can be categorised, as follows:

- *essential cookies*, which do not store personal data and which are required for the normal operation of the webpages on the web browser;
- *analytics/performance cookies*, which do not store personal data and which track visitors' actions on our website anonymously, collecting statistics to help us improve our website for visitors in general, for example, by reorganising content to make it easier to find;
- *functionality cookies*, which may contain personal data and which store the most recent values the user has chosen for specific website settings, such as text language and geographical region, such that they are applied automatically for their convenience when they next visit the website;
- *targeting cookies*, which may contain personal data and which track visitors' actions on our website identifiably, such that the website can display content and advertising which may be more relevant to their interests.

Our website currently employs only the following types of cookie:

- essential cookies,
- analytics/performance cookies.

Third parties connected with the provision of our website may also employ cookies, over which we have no control. Those third parties include, but are not necessarily limited to:

- the website's content management platform,
- external web traffic analysis services.

Your web browser has settings you can change to control which types of cookie to store ("set") or not ("block"), including the option to block all cookies. Note that if you set your browser to block all cookies, it will block essential cookies, then all or part of our website may not function correctly in your browser.

Your rights. You have the following rights in respect of the personal data we hold about you, except when overridden by law or court order:

- to be informed about our collection and use of them,
- to restrict our processing of them, including any processing of them which we may undertake to profile you or/and to make decisions automatically for you,
- to access them,
- to rectify them,
- to relocate them ("portability"),
- to erase them.

If you request to exercise any of the rights listed above, we will consider your request in accordance with all applicable data protection laws and regulations. No fee will be charged for our enacting of such a request unless we deem the request to be excessive.

Upon our successful verification of your identity, your right to be informed about our collection and use of your personal data extends to the following aspects:

- their specific nature (categories/fields),
- the purposes for which we collect and use them, including disclosure of their use to profile you or/and to make decisions automatically for you,
- the recipients, or types of recipient, to whom they have been or/and may be passed to, together with the location of those recipients,
- the duration for which we expect to store them, or/and the rationale for determining it.

In certain circumstances, we might not be able to provide you with access to some or all of the personal data we hold for you, but, if appropriate, we will notify you of the reasons for this.

You are permitted by law to withdraw your consent for our usage of your personal data at any time and without needing to specify any reasons. Note that we are legally required to hold some personal data to fulfil our statutory obligations, as described earlier in this policy document.

If you wish to exercise any of the aforementioned rights, or to make a complaint about our handling of your personal data, you can do so by contacting the HPP Data Officer (DTO, named at the foot of this document). You can also make complaints to the Information Commissioner's Office (ICO); the contact details and further information about how to do this can be found at ico.org.uk. Note that the ICO may expect you to have already given us reasonable opportunity to resolve your complaint ourselves.

Policy review. This policy is subject to annual review by the HPP committee, and is improved or amended as necessary subject to changes in legislation and to advice from relevant professional bodies, such as the British & International Federation of Festivals.

HPP Data Officer (DTO): Rachel Ellis

Contact the DTO using the online contact form on the HPP website, or by writing to the DTO at HPP's registered address (given at the top of this document).