



## Truro Cathedral

# Chorister Programme Privacy Policy

Truro Cathedral is committed to protecting your privacy. This document explains how we use any personal information we collect about you and how we protect that information. This Privacy Policy is specific to the personal information we collect about children and their families when expressing an interest in the chorister programme at Truro Cathedral, when applying to become a chorister, during their time as a chorister, and when members of Truro Cathedral Old Choristers' Association.

This policy should be read in conjunction with Truro Cathedral's main privacy policy which covers all other data collected when you have other interactions with Truro Cathedral, such as visiting the website, signing up to email updates, attending events, making donations or volunteering. You will find this here:- <http://www.trurocathedral.org.uk/privacy-policy>

Reference throughout this policy to 'chorister' or 'choristers' includes prospective choristers and their families who have expressed an interest in, or applied to, the chorister programme (including those attending 'Be a Chorister For a Day' events).

Reference throughout this policy to 'you' includes choristers and their families or legal guardians.

### **1. Who are we?**

Truro Cathedral is the data controller. This means it decides how your personal data is processed and for what purposes. Truro Cathedral comprises Truro Cathedral (HMRC Charity Reference Number X7943) and Truro Cathedral Limited (company registration number 04917372).

### **2. Your personal data**

#### **What is it and what do we collect?**

Personal data is information that can identify you. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. This can include information such as name, address, email address, bank details and any other information you provide when contacting us or filling in forms on our website – for example when asking about or registering for our events, such as a 'Be a Chorister For a Day', applying to and becoming a chorister, applying for a

bursary and subscribing to newsletters. If you contact us, we may keep a record of that correspondence or interaction.

A summary of the data collected through the life of a chorister at Truro Cathedral is found at the end of this policy.

### **Information from third parties**

We work in collaboration with Truro School and Polwhele House School in running the cathedral chorister programme. See the 'Sharing your personal data' section below for further information on the information we receive and share with Truro School and Polwhele House School.

We may buy anonymous external data (e.g. census data, Experian MOSAIC, TGI) and combine it with your personal data at an aggregated level to build profiles which help us work out what you're most likely to want to hear from us about and how.

### **Sensitive personal data**

At times we'll collect sensitive personal data for safeguarding purposes.

For example, we specifically collect health details of the choristers in our care to ensure we can provide appropriate care for them when necessary, such as sharing information with first aiders, medical professionals and emergency services in the event of illness or accident.

## **3. How do we process your personal data?**

Truro Cathedral complies with its obligations under data protection laws by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

## **4. What is the legal basis for processing your personal data?**

We process personal information for certain legitimate business purposes, which are not limited to but include some or all or of the following:

- To administer expressions of interest in the chorister programme;
- To run and administer the application and audition process for the chorister programme;
- To administer chorister records and contact with their parents or legal guardians;
- To safeguard children in our care;
- To maintain our own accounts and records (including the processing of bursary applications);
- To inform you of news, events, activities, appeals and services running at Truro Cathedral you have requested, or we feel may be of interest to you;
- To fulfil contracts made with you, e.g. online purchases and bursaries;
- To keep records of your contact preferences;
- Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of choristers and their parents;
- To identify and prevent fraud;
- To provide postal communications which we think will be of interest to you - keeping you informed about news, events, fundraising activities, appeals and services at Truro Cathedral;
- To determine the effectiveness of promotional campaigns and advertising;

- To administer Truro Cathedral Old Chorister's Association which all choristers gain automatic membership of when they leave the cathedral choir.

We also process personal information for certain other obligations, where processing is:

- necessary for the performance of a contract or to take steps to enter into a contract;
- necessary for compliance with a legal obligation;
- necessary to protect the vital interests of a data subject or another person;
- necessary for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the data controller;
- carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
  - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
  - there is no disclosure to a third party without consent.

## 5. Profiling

This section applies to chorister parents or legal guardians. We do not profile children under the age of 18. This would only apply to choristers when they leave the chorister programme and once they are over the age of 18.

We know it's important to our supporters to use our resources in a responsible and cost-effective way. So we may use automated profiling and targeting to help us understand our supporters and make sure that:

- our communications and services (e.g. our website) are relevant, personalised and interesting to you;
- our services meet the needs of our supporters;
- we use our resources responsibly and keep our costs down.

We may also gather additional information about you from external sources, for example: updates to address and contact information, or publicly available information regarding your wealth, earnings and employment at an aggregate level. We may use this information to assess your capacity to support us and invite you to do so.

This analysis may be carried out by us or by third party organisations working for us. We may also host encrypted personal data on third party websites (e.g. social media platforms) to ensure that you only see relevant, personalised and interesting content from those organisations.

Whenever we process data for these purposes we will ensure that we always keep your Personal Data rights in high regard and take account of these rights. You have the right to object to this processing if you wish and if you wish to do so please contact us at the details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit.

## 6. Sharing your personal data

We work in collaboration with Truro School and Polwhele House School in running the cathedral chorister programme. We hold information on choristers and their families across the two organisations and share parts of this information where necessary for two reasons: first, to join up our pastoral care of each chorister and to ensure that the school and cathedral

commitments are dovetailing smoothly for them; and, secondly, in order to save each organisation writing to request the same information. The data which you provide to Truro School and/or Polwhele House School will be subject to their own privacy policy also and we would direct you to read this also.

We will not, under any circumstances, share your personal data with or sell it to any third party for their own marketing purposes. We may share your data with third parties where they are processing your personal data on behalf of Truro Cathedral (for example, in the distribution of a mailing).

Where your data is processed outside of the EU on Truro Cathedral's behalf, this is only done where we have established that adequate safeguards are in place; for example, participation with the EU-US Privacy Shield Framework.

We may also share your personal data where we are required to do so by law.

## **7. How long do we keep your personal data?**

We keep data in accordance with the guidance set out in the guide "Chapter and Verse: The Care of Cathedral Records" which is available from the Church of England website <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

## **8. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Truro Cathedral holds about you;
- The right to request that Truro Cathedral corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Truro Cathedral to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data;
- The right to lodge a complaint with the Information Commissioners Office.

## **9. Further processing**

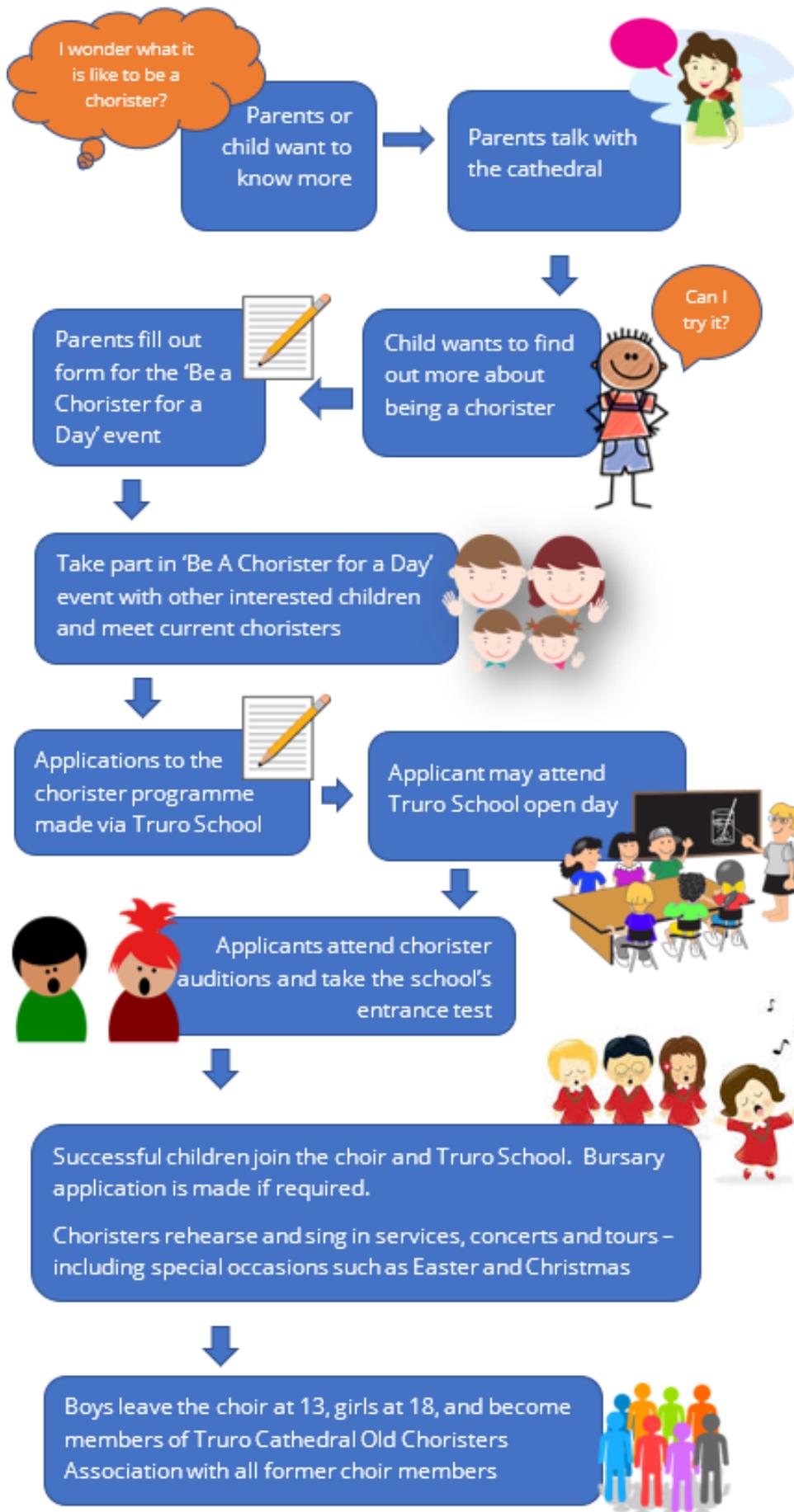
If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **10. Contact Details**

To exercise all relevant rights, queries or complaints please in the first instance contact Truro Cathedral at [info@trurocathedral.org.uk](mailto:info@trurocathedral.org.uk) or on 01872 276782.

We hope to be able to resolve any complaints about our privacy notice directly with you. However, if you feel this has not been achieved, you can contact the Information Commissioners Office (ICO) on 0303 123 1113 or online at <https://ico.org.uk/global/contact-us/email/> or by post to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

## 11. Summary of Data Collection



When data is collected	
Child Name	Parents Name; Contact details
Name; Date of birth; Medical details	Name; Contact details
(Destroyed after event)	
Name; Date of birth	Name; Contact details
Medical details (renewed annually and before major tours); Passport details for foreign tours (destroyed afterwards)	Financial details of those who choose to apply for bursaries
Medical details destroyed	Bursary applications destroyed within 5 months