

Richmond Rhythm Club

Data Protection & Privacy Policy

Musician Records

Policy reference	RRC-POL-DP-001
Version	1.0
Date adopted	12 April 2026
Review due	12 April 2027
Approved by	Club Committee

1. Purpose

This policy sets out how the Richmond Rhythm Club (the Club) handles personal data relating to jazz musicians who have performed at, or been considered for, Club events. It has been prepared to ensure that the Club meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who We Are

The Richmond Rhythm Club is an unincorporated association and acts as the data controller in respect of the personal data described in this policy. Queries relating to this policy should be directed to the Club Secretary.

3. What Personal Data We Hold

The Club maintains a register of musicians who have presented at Club events. For each individual the record may include:

- Full name
- Primary instrument(s)
- Contact details — email address and/or telephone number
- Dates of performances at Club events
- Notes relating to performances, musical style, or booking arrangements

The Club does not hold sensitive personal data (as defined under UK GDPR Article 9) in respect of musicians.

4. Lawful Basis for Processing

The Club processes this personal data on the basis of Legitimate Interests (UK GDPR Article 6(1)(f)). The Club has a legitimate interest in:

- Maintaining an accurate record of musicians who have contributed to the Club's programme
- Facilitating the booking and re-engagement of musicians for future events
- Preserving the musical heritage and history of the Club

The Club has considered whether these interests are overridden by the rights and freedoms of the individuals concerned and is satisfied that they are not. The data held is professional in nature, minimal in scope, and musicians have a reasonable expectation that a club for which they have performed would retain basic records of that engagement.

5. How We Use the Data

Personal data held in the musician register is used only for the following purposes:

- Recording and acknowledging musicians' contributions to the Club
- Contacting musicians to discuss future performance opportunities
- Internal planning and programming of Club events

The Club does not use musician data for marketing purposes, does not share it with third parties, and does not use it for any automated decision-making.

6. Where Data Is Stored

Musician records are held within the Club's club management software. Access is restricted to Committee members who require it for the purposes described in this policy. The Club satisfies itself, on adoption of any software platform, that the provider processes personal data in accordance with UK GDPR and maintains appropriate technical and organisational security measures.

7. Retention

The Club will retain musician records for as long as the Club remains active, or for a period of ten years from the date of a musician's most recent performance, whichever is the shorter. Records will be reviewed annually and deleted where they are no longer needed.

Where a musician requests deletion of their record (see Section 8), the Club will action this promptly unless there is a compelling legitimate reason to retain it.

8. Individual Rights

Musicians whose data is held by the Club have the following rights under UK GDPR:

- Right of access — to request a copy of data held about them
- Right to rectification — to request correction of inaccurate data
- Right to erasure — to request deletion of their record
- Right to object — to object to processing based on legitimate interests
- Right to restriction — to request that processing is limited in certain circumstances

Requests should be made in writing to the Club Secretary. The Club will respond within one calendar month of receipt. There is no charge for exercising these rights.

9. Data Breaches

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, the Club will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, and will notify affected individuals without undue delay where the risk is assessed as high.

10. Complaints

Any individual who believes their personal data has been handled incorrectly may raise a concern with the Club Secretary in the first instance. If they remain dissatisfied, they have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113 | www.ico.org.uk

11. Review

This policy will be reviewed annually by the Club Committee, or sooner in the event of a material change to the Club's data processing activities or to applicable legislation.

Approved on behalf of the Richmond Rhythm Club Committee

Signed	
Peter Jones	
Chairman	Club Secretary / Chair
13 April 2026	