

## **ALCS PERSONAL DATA AND PRIVACY POLICY**

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*This policy is currently being reviewed and will be updated to reflect the terms of the EU General Data Protection Regulation ahead of the deadline for UK implementation in May 2018.*

ALCS is registered with the Information Commissioner's Office and adheres to the principles established under the Data Protection Act (1998) regarding processing data relating to individuals.

### **Data collection**

In order to enable ALCS to participate in licensing schemes on behalf of its members and to distribute shares of the resulting income to them, the company maintains a Members Database comprising the following information:

- Personal information: names, contact and address details, dates of birth and death. Membership of any writers' unions is also recorded to enable the relevant discounting of ALCS membership fees.
- Payment information: details of ALCS income, bank details, agent details and agent bank details, HMRC registration information
- Works information: details of editions for books and serial publications; series and episode details for TV and radio programmes; film titles.

### **Data processing**

ALCS uses data linking authors and their works for the purposes of submitting claims to the licensing bodies we work in the UK and overseas. Typically this involves the exchange of data in the form of electronic files confirming schedules of works and authors that are represented by ALCS and, where relevant, the partner organisation.

ALCS contributes data to a secure international database of writers and composers ('IPI') which records the names and dates of birth of some ALCS members. ALCS also contributes data to a secure international database of audiovisual works ('IDA'), which records the titles of the works and the names and contributions of those ALCS members who participated in the creation of those works. These systems facilitate the efficient exchange of rights and payment information among collecting societies around the world, and are not publically accessible.

These data exchanges procedures, which apply to organisations based within and outside the EU, are necessary to allocate the income from the various ALCS licensing income sources

to individual members. At the end of the distribution process, ALCS submits various payment instructions to its bank detailing the relevant member's bank account details and the amounts to be credited.

In line with financial reporting regulations, ALCS is required to give full details of distributions to HMRC for any member paid more than £1,000 in the financial year. Details provided are: name, address, amount paid, VAT registration and whether or not the member is paid through an agency.

The ALCS auditors are also given access to our systems for the purpose of the audit only.

Other than as described above, personal data is never released to a third party without the member's prior permission.

### **Accessing/ updating data**

ALCS members can access and update and, where necessary, correct the data we hold in respect of their personal, financial and works information via the Members' area of our website ([www.alcs.co.uk](http://www.alcs.co.uk)). The members' area is open to Ordinary and Successor Members of ALCS. Members are given online access when they join ALCS. Subsequent access to the Members' area requires entering a username/email address and password which is encrypted and known only to the member. Bank account information is never returned fully to members in their online account (account numbers are only partially shown, ie \*\*\*\*1111).

For members who choose not to register for the Members' area of the website, requests for access to information regarding personal, financial and works information should be made in writing to the ALCS Membership Department, Fifth Floor, Shackleton House, 4 Battle Bridge Lane, London SE1 2HX or via email [members@alcs.co.uk](mailto:members@alcs.co.uk). Prior to meeting such information requests ALCS will require you to prove your identity by providing two or more pieces of approved identification.

### **Security of data provided to ALCS**

The data that Members provide on-line to ALCS is protected by Secure Sockets Layer (SSL) encryption technology. This is the standard technology used for providing a secure channel for data flowing between web servers and browsers.

All paper applications that are sent in are scanned into electronic format and stored on a database which is password and firewall protected. On a daily basis members' personal data is backed up to a secure location.

Please direct any enquires relating to this policy to: The Data Controller, ALCS Limited, Fifth Floor, Shackleton House, 4 Battle Bridge Lane, London SE1 2HX, or via email [alcs@alcs.co.uk](mailto:alcs@alcs.co.uk).