



STOW & DISTRICT CIVIC SOCIETY

Registered Charity No. 264597

Data Protection Policy

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Introduction

As a charity and membership association the Stow & District Civic Society is committed to protecting the personal data it holds on members by complying with relevant Data Protection Laws. This document sets out the policy and processes by which the Society complies with these laws.

What is the Data Protection Act (DPA) and the General Data Protection Regulation (GDPR)?

The DPA was passed in 2000 in response to the 1995 Data Protection Directive (DPD), created when internet marketing was in its infancy. The Act made provision for the regulation of the processing of information relating to individuals, including the obtaining, holding, use or disclosure of personal information.

On the 25th of May 2018 the General Data Protection Regulation (GDPR) comes into force. The GDPR is a regulation drawn up by the European Parliament, the Council of the European Union and the European Commission to give citizens more control over how their data is used. This regulation will be unaffected by Brexit and will affect the way all organisations including the Civic Society can store, process and use personal data.

Being transparent and providing accessible information to individuals about how the Society will use their personal data is a key element of the Data Protection Act 1998 (DPA) and the EU General Data Protection Regulation (GDPR).

What data is protected under the GDPR?

According to the European Commission, personal data is 'any information relating to an individual, whether it relates to her or his private, professional or public life. It can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer's IP address.'

What personal data do we collect and why?

As part of the membership process for the Society we collect and store names, home addresses, telephone contact numbers, email addresses, the membership fee paid and when this was received. This information is kept purely for the administration of the Society and is not shared with any third parties. It allows us to keep members informed about Society events, talks, trips, membership renewals and other activities arranged by the Society or taking place in the local area.

Legally shared information

Whilst we will not share information with other societies, organisations or third parties, if members have signed up for Gift Aid we do have a legal requirement to potentially share contact information with HMRC if asked.

Consent

It is important that we are transparent with our members about what personal information we hold and that we have asked permission to store and use their details. This permission can be found on the membership application form which should be completed and signed by members covering the current year's subscription.

Under the Act, consent is only deemed relevant for the term of the subscription and the Society will therefore need a completed and signed membership form for each subscription year. The Society's membership year runs from 1st September to 31st August each year.

According to the Society's constitution members have until 1st January in the following year to renew. Also, if new members join after 1st May their membership subscription is deemed to roll over into the following year. Under these circumstances consent is deemed to be extended to these periods.

Members rights

All members have the right to:

- be removed from the list
- see what information is stored about them at no cost
- have their history deleted
- change details
- restrict processing
- data portability
- object
- not to be subject to automated decision-making including profiling

Subject access requests

To request access to the information held, members should contact the Hon. Secretary of the Society.

We will not charge for complying with a request and we have a month to comply. However, under the Act we can refuse, or charge for, requests that are manifestly unfounded or excessive. If we refuse a request, we must tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. We must do this without undue delay and at the latest, within one month.

Accountability and Governance

The Society has designated the Hon. Secretary to take responsibility for data protection compliance. The Hon. Secretary is an elected officer of the management committee.

Changes and updates to the records are only allowed by the Hon. Secretary who, traditionally, is also responsible for membership and renewals.

Under the Act we are required to specify the lawful reason for collecting this personal information. The Society has determined that it is 'Consent' when the individual has given clear consent for us to process their personal data for a specific purpose.

Where and how is it stored?

Membership information is stored electronically in an Excel Spreadsheet. The file is password protected and maintained on a Windows PC operating the latest version of the operating system protected by antivirus software and appropriate firewalls.

Backup versions are maintained whenever the file is updated and stored on a separate storage device.

Original paper membership forms are securely stored and shredded when no longer required.

Who can view information?

This file is not shared with any third parties or with the general membership. It is only available for viewing by four committee members as listed below:

- The Hon. Secretary – who manages the membership and renewal process
- The Treasurer – to maintain financial control of the Society
- The Chairman – who circulates information and emails to members
- The Events Manager – to ensure that people attending trips etc are members

Data Breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can include:

- access by an unauthorised third party
- deliberate or accidental action (or inaction) by a controller or processor
- sending personal data to an incorrect recipient
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission
- loss of availability of personal data

The Society must report a notifiable breach to the ICO without undue delay, but not later than 72 hours after becoming aware of it. If we take longer than this, we must give reasons for the delay.

When reporting a breach, we must provide:

- a description of the personal data breach including, where possible:
 - the categories and approximate number of individuals concerned
 - the categories and approximate number of personal data records concerned
- the name and contact details of the data protection officer or other contact point where more information can be obtained
- a description of the likely consequences of the personal data breach

- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

Complaints

In the first instance written complaints should be raised with the Stow & District Civic Society addressing letters to the Hon Secretary at the address below:

Dave Wiblin
Hon. Secretary
Stow & District Civic Society
7 Mangersbury Park
Stow on the Wold
Gloucestershire
GL54 1DU

If the Society has been unable, or unwilling, to resolve a complainant's information rights concern, the matter should be raised with the Information Commissioner's Office (ICO). They will use the information provided, including the Society's response, to decide if the complainant's concern provides an opportunity to improve information rights practice. If the ICO think it does provide that opportunity, they will take appropriate action. This could take a variety of forms.

You can contact the ICO at the address below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 or 01625 545745

Produced by:

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7 Mangersbury Park
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Agreed at committee on 28th February 2018

Appendix A – Privacy notice

Privacy notice on membership application form:

How information about you will be used

The information you have given us on this form will be used solely to administer the Stow & District Civic Society and will not be shared with any third parties. However, if members sign up for Gift Aid we have a legal requirement to share some information with HMRC if requested.

During your membership we would like to keep you informed about Society activities and events happening in the area by sending you emails or information through the post. If you agree to this, please sign below:

Signature:

Date: