

# Norwich ABC

## General Data Protection Regulation (GDPR) Policy – Ver. 2.0 (17 May 2018)

### 1. Why we need this, and its purpose.

The Club wants to be responsible with the data you have provided to us. This is just as well because all organisations in Europe are accountable for it, and have an obligation to demonstrate compliance with the data protection principles. From 25 May 2018 this is also law and there are very heavy fines for not complying too.

The Data Protection Act 1998 and General Data Protection Regulation 2018, applies to the processing of personal data. Norwich ABC (“the club”) is committed to complying with its legal obligations. Norwich ABC collects and processes personal data relating to its members in the course of running the club, administering membership, communicating with members about club events, news, etc.

This policy covers any individual about whom the club processes data. This may include current and former members. Processing of data includes: gaining consent, collecting; recording; presenting; storing; altering; and destroying.

### 2. Key points for members:

- We will only collect the information that we need from you to keep you updated with your membership, events and renewals.
- We will not share your data with anyone outside the Club Committee, except when required by Law.
- We will not attach your full name to any photos, without your permission. However, we may use your first name.
- Ask us if you want a summary of the information we hold about you, or you wish your details to be deleted.
- The club will take reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of both electronic and paper records.
- Sensitive data – As a general rule we don't ask or keep sensitive data about you (e.g. health/medical information, date of birth, bank account details, political or religious beliefs etc.). However, should we require to attain any general health status if you attend one of our events this will be kept in paper format so that we don't need to worry about extreme levels of electronic security.
- Should there be a data breach or your data is compromised we will contact you and let you know what has happened.
- By joining the club, you provide consent for us to use your contact details so that we can contact you about the membership you have purchased: club events, club news, any changes to terms and conditions and membership renewals. If we want to use your details for any other purpose than website photographs, then we will ask for your consent first.

### 3. Membership data and how we manage it.

The following table lists what data we have, why we have it, where it came from, who looks after it, how we process it, how we keep it safe, and how long we keep it for.

Data Title	Why we need it?	Data Source	Owner – who maintains and looks after it	Format	Personal Information	Who its shared with	Processing	Security	Retention period, and reason.
Membership application forms	To identify a member, their contact details for communications and evidence of their acceptance of club rules.	Members	Membership Secretary	Original signed paper forms	Names of members, Address, Phone Number, Email address	N/A	Membership Renewals, Copying into membership database.	To be kept in locked premises, usually the home of the owner.	<b>3 years</b> , as evidence members have accepted Terms and Conditions in case of any claim against the Club. Longer if there is an active Claim.
Current Membership database	Membership data base	Electronic record of membership application data	Membership Secretary	Excel file	Names of members, Address, Phone Numbers, Email address, Emergency Phone Number	NABC Committee members	Used as membership database of paid and Life members.	Cloud-based Excel file	<b>3 years</b> , as back up to read-only PDF file.
Communication protocol to club members	So that committee member can send club information to members	Cloud-based Excel file	Committee member as appropriate	Excel file	Names of members, Address, Phone Numbers, Email address, Emergency Phone Number	NABC Committee members	Used as distribution email distribution list by committee members as required.	Hide email addresses between members by addressing in the BCC fields.	<b>None</b>

Monthly meeting minutes	A formal record of reporting and decisions.	Committee meeting	Minutes Secretary	Word file	Members attending meetings, other Member names may be recorded.	NABC Committee members	Information is not processed, just recorded.	Master copies Minutes Secretary and Chairman as a backup	<b>10 years.</b> Board Meeting minutes need to be retained by law.
Monthly meeting resume	A synopsis of the minutes	Monthly meeting minutes	Minutes Secretary	Word file	New Members names may be recorded.	Club members	No processing.	Hide email addresses between members by addressing in the BCC fields.	<b>None</b>
AGM minutes	To comply with the Club constitution	All members	Minutes Secretary	Word file	Any name that may be mentioned, apologies, committee member nominations etc.	Club members	No processing.	To include no personal data, only include names as absolutely necessary.	<b>10 years</b> – board meeting minutes to be retained by law.
Event registration forms	Event governing body requirements (i.e. CTT, BC, ECCA)	Members and temporary members.	Varies - Designated event manager	Hard copy	Name, address, emergency contact number and signature	Event organiser	No processing	To be kept in locked premises, usually the home of the owner.	<b>3 years</b> , as evidence members have accepted Terms and Conditions in case of any claim against the Club. Longer if there is an active Claim.
Internet published photos and updates	To share updates to members, and help promote the Club, historical records for the Club	Members, event photographers	NABC Website Manager	Hosted on the internet by various organisations	Names	Everyone	No processing	None	Indefinitely, unless requested to remove it.

#### **4. General security standards adopted by those on the committee who have access to personal data:**

- Data is not copied outside the club, or club committee without the permission of the Membership Secretary.
- Data must be restricted to those that need it.
- Computer equipment is protected from general access via a password or PIN.
- Computer software is protected by an up to date operating system and security software.
- Paper records are locked inside the home and identified, with the retention date marked.
- Backup copies of the Excel file are Cloud-based to guard against data loss due to computer failure.
- Data is deleted/destroyed after the retention date has been reached.
- We will keep member data accurate, if we detect an error we will strive to correct it.

#### **5. Breaches of Information**

Any breaches of information must be reported immediately to the Membership Secretary. Members need to be advised as soon as any breach is discovered and what information has been compromised.

#### **6. Photographs**

In the case of photographs taken at organised club events, some of those images may be used to help promote and illustrate the club's activities, on Facebook, Twitter, Instagram and on the club website. Members declare as part of the application or renewal process that they consent to this use, subject to being able to opt out when signing in to the event itself. Any such photography will never ascribe further identification to a member/s, for example by including names in any narrative.

Any photography will exclude individual images of members under 18 years, in compliance with the club's Child Protection Policy, unless specific written parent or guardian consent is expressly given before such photography takes place. For practical reasons, members under the age of 18 attending organised club events MAY have images included in group photographs.

## **7. Data Controller and queries**

The Membership Secretary is the Data Controller for club. They bear overall responsibility for ensuring compliance with the Data Protection Acts. They will answer queries or deal with members' concerns about data protection.

If you wish to complain about the way your data is being managed, then please write to the Chairman. If you are unhappy with the Chairman's response then you have a right to contact the Information Commissioners Office, ICO ([IOC.org.uk](http://IOC.org.uk), Tel. 0303 123 1113)

## **6. Access requests**

Members are entitled to request data held about them on computer, or to request a photo copy of their original paper membership application or renewal. The Data Controller will provide this information within a 6 month period. However, the Club reserve the right to charge a reasonable fee to do so.

## **7. Review**

This policy will be reviewed from time to time to take into account changes in the law and the experience of the policy in practice.