

# Data Protection Policy and Procedures



## **Introduction**

The nature of the club and the membership information recorded means that it is exempt from Registration under the Data Protection Act 1998. Although exempt from registration, we need to have good, agreed, working practices and that is what this policy sets out.

To meet the requirements of the Data Protection Act 1998, all personal data held by the Windmill Walkers Club will meet the following principles of good practice, whether processed on paper or by computer. This Policy Document is sub divided into seven sections.

- (1) Data is fairly and lawfully processed.
- (2) Data is processed for limited purposes.
- (3) Data is adequate, relevant and not excessive.
- (4) Data is accurate.
- (5) Data is secure.
- (6) Data is not kept longer than necessary.
- (7) Data subjects' rights.

This Policy came into effect in January 2015.

Our policy was reviewed in January 2018 and, we believe, is compatible with the European General Data Protection Regulation (GDPR) which is effective from May 2018.

## **(1) Data is fairly and lawfully processed.**

- Data will only be used where either (a) the individual has given his or her consent, or (b) it is necessary to pursue the legitimate interests of the Club.
- All members will be told when they join the Club that their personal data may be processed by computer.
- Application for Membership Forms will be retained as confirmation of this for so long as the individual maintains their membership.

## **(2) Data is processed for limited purposes.**

- Data will only be used in connection with Club activities -
  - Maintenance of membership records
  - Recording of bookings for Club rambles and other Club activities
  - Conduct of Club business (e.g. distribution of notices, newsletters, etc.)

## **(3) Data is adequate, relevant and not excessive.**

- Personal data held about members will be restricted to -
  - Name
  - Address
  - Phone number (acknowledging Ex-D numbers)
  - Mobile phone number
  - Email address
  - Year of joining

## **(4) Data is accurate.**

- The data will be obtained from members themselves and will be recorded accurately. Members are responsible for notifying changes of address etc., but where data is

found to be inaccurate, corrected data will be verified with the member.

**(5) Data is secure.**

- Computer data will be held in protected files and held on a storage medium which is removable from the computer and stored in secure conditions.
- Membership lists will be made available only to Club committee members for use only on legitimate Club matters and retained only for so long as they remain Committee members.
- The distribution of mass E-mail messages should use a 'blind copy' technique so that e-mail addresses are kept secure.
- Paper records, in particular membership lists, will be kept in such a way that they cannot reasonably fall into unauthorised hands.
- Records will be shredded or mutilated before disposal so that personal data cannot reasonably be reconstructed from the remains.

**(6) Data is not kept longer than necessary.**

- Membership subscriptions fall due in January each year and members may renew their membership until the end of February. At this point Application Forms from members who have not renewed their membership will be destroyed.
- All personal data in respect of members who have not renewed their membership will be deleted from computer records
- All membership lists for the previous year will be destroyed.
- Individuals who wish to 'renew' their membership after this date will complete a new Membership Application Form.
- Data held in respect of non-members who participate in walks as guests will be deleted as soon as their involvement with the Club has passed.

**(7) Data subjects' rights.**

- Personal data will not be disclosed to any person or organisation outside the Club without the specific permission of the individuals concerned.
- Membership records will not be used by Club members or Club Committee members or any other person or organisation to offer unsolicited goods or services to members, but the Club may use the membership lists to notify members of normal Club activities and Club administration activities.
- Any member who requests details of their personal data held by the Club shall be provided with a copy of their computer record and Membership Application Form.
- Note that it is, strictly, an offence for any personal data about a member to be given to another member except for the purpose of conducting legitimate Club activities.

KDY (17.01.2014) DE (29.09.2014)

Adopted at the AGM 10 Jan 2015

Reviewed Jan 2018 as compatible with European General Data Protection Regulation (GDPR) effective from May 2018.