

## Implementing GDPR – what you need to know

At the 12 July 2018 committee meeting, it was agreed that:

- The Centre takes the 'Legitimate interest' legal basis to fulfilling the regulation
- A short policy is agreed identifying accountability and following the six GDPR principles
- The Committee act as Data Controllers for the Centre
- The processes followed are documented and communicated to members

### Policy

This policy complies with GDPR by adopting LEGITIMATE INTERESTS as the legal basis.

This is where the processing of member's data is necessary for our legitimate interests eg communicating with member about events through newsletters and emails. It is the most appropriate as we use data in ways members would reasonably expect and which have a minimal privacy impact, or there is a compelling justification for the processing.

To comply with this we will communicate our approach and how we are implementing it to members through the newsletter and website. There is no requirement for members to take action or give consent, or for the Centre to record it.

### Privacy Statement

Our privacy statement, which will appear in newsletters and on our website, is amended to:

'To comply with GDPR 2018 the Centre has adopted 'Legitimate Interests' as the legal basis, and so only collects the personal information that we need to legitimately keep our members informed of activities. We keep their data secure, relevant and up to date, for as long as we need to, and we don't share it with third parties. If you would like to see how the Centre implements our data protection policy or you own records please contact the Secretary.'

### Data Protection Policy and implementation processes

The GDPR, effective from May 2018, requires us to let members know how data about them is collected, processed, used and safeguarded.

How do we obtain information about members?

Members provide the Centre with personal data when they:

- Complete an initial membership application form or an annual membership renewal form
- Complete an application form for any outings or social event
- Request to be added to mailing list for certain groups eg email newsletter or Walking group
- Request that their details are updated eg change of address

In no circumstances do we obtain additional information about members from any other sources. Our website does not use cookies, and we have no record of who accesses the website and when.

What information do we hold on members?

- Name, address including postcode, telephone number, email address (if members choose to receive newsletters and updates by email), National Trust membership number, type of membership (Individual or Joint), payment method (cheque/cash or standing order)
- Event organisers may hold information members have supplied them with such as emergency contact name and telephone number in case of accident or injury, or any food allergies when booking for lunches as well as the booking/attendance lists for events.
- We DO NOT retain on paper or electronically any record of members Bank Account details. Members are responsible for setting up/amending Standing Orders direct with their bank.

How do we use membership data information?

- To send newsletters – by post or email, according to stated preference
- To contact members about outings and social events for which they have applied
- To respond to any queries from members
- To contact members in an emergency eg if an event has to be cancelled
- To provide members with information about the Centre and the Trust

How do we keep membership information secure?

- We do not use member's information for any purposes other than those set out above neither do we share their details with third parties
- Each member of the committee and event organisers responsible for collecting personal data are required to sign an annual confirmation that they will only collect, handle, retain or destroy/delete such data in accordance with the Data Protection Act 1998 and GDPR 2018. These are held by the Secretary
- The membership database is held by the Secretary and Membership Secretary in a password protected EXCEL file on password protected computers, with anti-virus software. It is not available to other committee members, with the exception of the Email Newsletter distributor who receives email addresses only of those requesting email newsletters.
- A section of the membership database is sent to an external printers to produce mailing labels for newsletters. These are sent in encrypted format and deleted after one off use.
- The Membership Secretary maintains a secure paper based card filing system
- Membership Application forms and Renewal forms are shredded after 1 year.
- When a member leaves the Centre, their details are removed from the database and the card system immediately. The membership card is kept for 1 year and then shredded
- After an event has taken place, all paper based documentation is shredded, and associated electronic lists are deleted.

What are Member's rights?

- Under the Data Protection Act (1998) and GDPR (2018) members have the right to withdraw their consent at any time by making a request to the Membership Secretary, and their information will then be edited from our records. Members need to be aware, however, that in doing so, they will then make it impossible for the Centre to contact them by post, telephone, or email about their membership and any activities or events that we organise
- Members may submit to the Secretary a written request (including name and address) to see a copy of their

personal data kept by the Centre either in hard copy or electronically. This must be provided by the Secretary within a maximum of one month of the request being received. In the case of any document in which personal details are recorded alongside those of other members who could be identified it is entirely legitimate for other sections of the document to be deleted or redacted to protect the privacy of any other members concerned. If upon, accessing their data, a member believes it to be inaccurate or incorrect they have a right to ask us to correct it promptly.

•We aim to work with members on any concerns or questions they may have about how we are handling their personal data. If however, they remain dissatisfied they have the right to complain to the Information Commissioner's Office (ICO)