



PRIVACY POLICY

This document sets out the Privacy Policy of the Friends of Avon Meadows CIO in compliance with the requirements of the General Data Protection Regulations.

DEFINITIONS

The terms **Member** and **Membership** as used in this policy document shall refer to both Members and Associate Members of FoAM.

The term **FoAM** shall refer to the Friends of Avon Meadows CIO.

GDPR shall refer to the General Data Protection Regulations.

OBJECTIVES

It is the intention of FoAM to hold only sufficient data for the safe and efficient operation of the FoAM in full compliance with the GDPR.

Such information may be transferred between members of the Committee for the sole purpose of carrying out FoAM's business (see Clause 4 below) but otherwise only with the written permission of the owner of that personal data (see also Clause 7 below).

SPECIFIC PROVISIONS

1. **Data Manager:** A Data Manager will be appointed who will hold and maintain, securely, the master data list. The Trustees will continue to be jointly responsible for data security.
2. **Data Manager's responsibilities:** The Data Manager shall carry out the following activities:
 - 2.1. To provide guidance to FoAM data holders in line with the GDPR and this Policy.
 - 2.2. In line with the GDPR and this Policy ensure that data used by FoAM is accurate, securely held, used in accordance with GDPR guidelines, retained and destroyed.
 - 2.3. Report any breaches to the appropriate authority.
 - 2.4. Ensure that the correct GDPR notices are included in all relevant communications.
 - 2.5. To manage any request by a Member to delete their data.
3. **Computer Security:** Computer files holding personal data will be protected by a strong password (i.e. more than 8 characters comprising alpha, numbers and symbols). For

internal security reasons this password will only be held by the Chairman, Treasurer and Secretary in addition to the Data Manager.

- 3.1. Personal data shall **not** be transferred using memory sticks, discs or other removable devices.
 - 3.2. It is preferred not to provide printed paper reports listing members data.
 - 3.3. eMail address lists are regarded as secure provided the eMail account is protected by a strong password.
4. **Data held by FoAM:** Data held by FoAM shall be as follows:
- 4.1. Associate Members: Full name and eMail address.
 - 4.2. Full Members: Full name, eMail address and postal address.
 - 4.3. Work Party volunteers: Full name, personal telephone number and an emergency contact telephone number. Note that this information will be in addition to any information held under Clauses 3.1 and 3.2. Additionally, relevant medical information will be required (information about conditions, pharmaceutical treatments that would be essential in case of an emergency) for Work Party Volunteers.
 - 4.4. It is a condition of membership that members shall provide the information as set out above.
5. **Data for Committee Members:** The Data Manager may provide personal data to Committee members for the purpose of carrying out FoAM business under the following conditions.
- 5.1. Data will only be provided for specific FoAM requirements and such requirements will be recorded by the Data Manager.
 - 5.2. The Committee Member automatically undertakes not to divulge such information to third parties (whether on the Committee or not).
 - 5.3. The Data Manager will ensure that Members' data is updated as necessary.
 - 5.4. If a Member wishes his data to be removed the Data Manager will inform all Committee Members holding personal data to remove this data.
 - 5.5. Normally, membership data will be held by the Chairman, Secretary, Treasurer, Work Party Coordinator, Data Manager and newsletter editor. Data held will be just sufficient for each to carry out their duties.
6. **Request for data held:** A member may ask to see all personal data held on them at any time. This will be freely provided to the member within 28 days from the date of the request.
7. **Request to delete data:** A member may request that their information may be wholly deleted from FoAM records. This will be carried out within 28 days of the request. Members should note that once their information is deleted they can no longer be members of FoAM.

8. **Requests for a Member's data:** All requests for members' information shall be referred to the Data Manager. The Data Manager will contact the member concerned directly and ask them to contact the person requesting the information.
[For example: If Tom wants Helen's eMail address, he contacts the Data Manager. The Data Manager contacts Helen and asks her to get in touch with Tom at her discretion. This is the extent of FoAM's action.]

9. **Retention Policy:** Generally, personal data, as described above will be held indefinitely. Exceptions to this will be subject to notification by a member or their relatives.
Members' data will be deleted:
 - 9.1. If a Member dies.
 - 9.2. If a Member asks for his membership to be terminated.
 - 9.3. If a Member is expelled from the FoAM.

10. **Destruction Policy:** When data is no longer required as set out in Clauses 6 and 8, this data shall be carefully deleted by all parties holding the data.
 - 10.1. Paper copies (not preferred) shall be shredded.
 - 10.2. Digital copies shall be deleted of all devices holding such data, mainly personal computer hard discs and/or eMail address lists.

Draft prepared by: R D E Stott on 27 April 2018.