

# **Hoole History and Heritage Society**

## **Data Protection Policy and Procedures**

### **Introduction**

The Society is committed to a policy of protecting the rights and privacy of individuals. The Society needs to collect and use personal data in order to communicate with its Members. This personal information is entrusted to us and we respect that trust by complying with relevant law and adopting good practice.

The Data Protection Act 1998 (**DPA**) and the General Data Protection Regulation 2016 (**GDPR**) govern the use of information about people (**personal data**).

**“Personal data”** means information about living individuals that enables them to be identified such as names, addresses, telephone numbers and email addresses.

Personal data can be held on computer or in a manual file and includes email, minutes of meetings, and photographs. The Society is the **data controller** for the information held. The Society and certain of its officers will be personally responsible for processing and using personal information in accordance with the Data Protection Act. Those who have access to personal information will be expected to read and comply with this policy.

### **Purpose**

The purpose of this policy is to set out the Society’s commitment and procedures for protecting personal data.

### **Why this policy is important**

We are committed to protecting personal data from being misused, getting into the wrong hands as a result of poor security or being shared carelessly, or being inaccurate.

This policy sets out the measures we are committed to taking as a Society and what each of us will do to ensure we comply with the relevant legislation.

### **Our data protection responsibilities**

In particular, we will make sure that all personal data is:

- a) processed lawfully, fairly and in a transparent manner;
- b) processed for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary for the purposes for which it is being processed;
- d) accurate and, as far as possible, up to date;

- e) not kept longer than necessary for the purposes for which it is being processed;
- f) stored and processed in a secure manner, by using appropriate technical and organisational means;
- g) processed in keeping with the rights of data subjects regarding their personal data.

### **The purposes for which we use personal data**

We process personal data to help us:

- a) maintain our list of Society members;
- b) maintain our accounts and records;
- c) promote our events and circulate relevant information and
- d) respond effectively to enquirers.

### **How we legally use personal data**

Processing of personal data is only lawful if it meets at least one of the six conditions listed in Article 6 of the GDPR. The conditions under which the Society processes personal data is that the processing is necessary for the legitimate interests pursued by the Society unless these are overridden by the interests, rights and freedoms of the individual (**the data subject**). Otherwise, processing will only be lawful if the data subject has given their clear consent.

“**Processing**” means any activity that involves the data including obtaining, recording or holding data, carrying out any operation on the data including organising, amending, retrieving, using, erasing or destroying it. It can also mean listening to a recorded message (e.g. voicemail, recorded reminiscences etc.) or viewing personal data on screen or in a paper document, viewing moving or still images of living individuals.

### **What we must tell individuals before we use their data**

Personal data is usually collected directly from the individual. We will inform them in writing about our contact details and those of the person acting as the Society’s Data Protection Officer, the reasons for processing and the legal basis and explaining, who we will share the data with (if at all), how long the data will be stored and the data subjects’ rights.

This information is commonly referred to as a ‘**Privacy Notice**’.

This information will be given at the time when the personal data is collected.

### **When we need consent to process data**

Where we are required to get consent from the data subject, we will clearly set out what we are asking consent for, including why we are collecting the data and how we plan to use it. Consent will be specific to each process for which we are requesting

consent and we will only ask for consent when the data subject has a real choice whether or not to provide us with their data. We will only process personal data for the specific purposes explained in our privacy notices.

Consent can however be withdrawn at any time and if withdrawn, the processing will stop. Data subjects will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent

### **Data will be adequate, relevant and not excessive**

We will only collect and use personal data that is needed for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes. We will not collect any personal data “just in case” we want to process it later.

### **Accurate data**

We will make sure that personal data held is accurate and, where possible, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on, if necessary.

### **Keeping data and destroying it**

We will not keep personal data longer than is necessary for the purposes for which it was collected. We will only retain personal data for three months after a data subject’s membership of the Society has ended, lapsed or not been renewed except where statutorily required to do so. We will ensure that such data is destroyed and securely disposed of.

### **Security and storage of personal data**

We will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage. It will only be accessible to authorised Society Officers.

### **Keeping records of our data processing**

To show how we comply with the law we will keep clear records of our processing activities and of the decisions we make concerning personal data.

### **Data subjects’ rights**

We will process personal data in line with data subjects' rights, including their right to:

- a) request access to any of their personal data held by us (known as a **Subject Access Request**);
- b) ask to have inaccurate personal data changed;
- c) restrict processing, in certain circumstances;

- d) object to processing, in certain circumstances, including preventing the use of their data for direct marketing (i.e. sending information about events etc.) and
- e) withdraw consent when we are relying on consent to process their data.

Any request from a data subject that relates or could relate to their data protection rights, will be forwarded to our Data Protection Officer immediately.

We will act on all valid requests as soon as possible and at the latest within one calendar month, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

All data subjects' rights are provided free of charge.

### **Direct marketing**

We will comply with the rules set out in the GDPR, the Privacy and Electronic Communications Regulations 2003 (PECR) and any laws which may amend or replace the regulations around direct marketing. This includes, but is not limited to, when we make contact with data subjects by post, email, text message, social media messaging, telephone (both live and recorded calls) or fax.

**“Direct marketing”** means the communication (by any means) of any advertising or marketing material which is directed, or addressed, to individuals. “Marketing” does not need to be selling anything, or be advertising a commercial product. It includes contact made by organisations to individuals for the purposes of promoting the organisation’s aims.

Any direct marketing material that we send will identify Hoole History and Heritage Society as the sender. Data subjects can object to receiving similar communications in the future. If a data subject exercises their right to object to direct marketing we will stop the direct marketing as soon as possible.

### **Sharing information with others**

We will not share personal data with other organisations or people unless we have obtained the data subject’s specific consent to do so.

### **Dealing with data protection breaches**

Where the Society’s Officers or Committee Members think that this policy has not been followed, or data might have been breached or lost, this will be reported immediately to the Data Protection Officer.

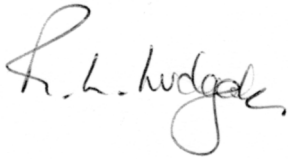
We will keep records of personal data breaches, even if we do not report them to the ICO.

We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within 72 hours from when someone in the Society becomes aware of the breach.

In the unlikely situation where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

This policy has been approved by the Society's Committee which is responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we obtain, store or use personal data.

Signed on behalf of the Society:

A handwritten signature in black ink, appearing to read 'S. L. Hudge', written in a cursive style.

Secretary

Dated: 1<sup>st</sup> May 2018

Review Date: 1<sup>st</sup> May 2019