

The East Bergholt Society

Policy for use and Protection of Data

General statement of the Society's Duties and Scope

The East Bergholt Society (the Society) is required to hold and process relevant personal data regarding members of the Society and outside organisations for a variety of purposes. This policy sets out how we will take all reasonable care to protect personal data to which we have access in the course of our operations.

The Society is not required to appoint a Data Protection Officer but the Secretary will act as Data Processor and will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the GDPR 2018.

The Principles

- The Society shall as far as is reasonably practicable comply with the Data Protection Principles (The Principles) contained in the Data Protection Act and the General Data Protection Regulations to ensure all data is:
 - Fairly and lawfully processed.
 - Processed for its lawful process.
 - Adequate, relevant and not excessive.
 - Accurate and up to date.
 - Not kept for longer than necessary.
 - Processed in accordance with the data subject's rights.
 - Secure.
 - Not transferred to other countries without adequate protection.

Definitions

- **The East Bergholt Society** is a charity registered with the Charity Commissioners, charity number 266062
 - **The purposes** for which personal data may be used by us are:
 - Compliance with our legal and governance obligations and good practice.
 - Routine business reasons, such as recording transactions, event planning and bookings, and the distribution of information of relevance to members.
 - Investigation of complaints.
 - Checking references, monitoring and managing access to administrative information.
 - Promoting the aims of the Society.
- **Data Subject:** an individual who is the subject of personal data.

Personal Data and Sensitive Personal Data

Personal Data covers facts about an individual (such as name, address, phone and email contact details) where that data identifies an individual. Personal data may also include sensitive personal data as defined in the Regulations. **Sensitive Personal Data**, however, is **not** requested, sought or held by the Society. (Sensitive Personal data includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, physical or mental health conditions or criminal offences.)

Processing of Personal Data

Consent may be required for the processing of personal data. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

The Society processes some personal data to maintain its routine operations (eg: event invitations and committee calling notices) and fund-raising purposes. Data subjects have the right to request to opt-out to these activities, which will be respected.

Rights of Access to information

Data subjects have the right of access to the information held by the Society, subject to the provisions of the Data Protection Act 1998, the General Data Protection Regulations 2018 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to the Data Processor. The Society will endeavour to respond to any such written request as soon as reasonably practicable and in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to the Society's attention and in compliance with the various Acts and Regulations.

Exemptions

Certain data is exempted from the provision of the Data Protection Act and the General Data Protection Regulations including:

- The prevention and detection of crime

Any further information on exemptions should be sought from the Data Processor.

Accuracy

The Society will endeavour to ensure that all personal data held in relation to data subjects is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this. Data subjects must notify the Data Processor of any changes to information held about them. Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the Data Processor (the Secretary).

Your personal data

You must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the Secretary so that the data can be updated in the records.

Enforcement

If an individual considers that the Society has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act and the General Data Protection Regulations, they should notify the Data Processor.

Data Security

The Society will take all appropriate technical and organisational steps to ensure the security of personal data.

The Society and its committee are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and will be password protected when transported offsite.

External Processors

The Society will ensure that data processed by external processors, for example, service providers, web sites etc are compliant with this policy and the relevant legislation.

Secure Destruction

When data held in accordance with this Policy is destroyed, it will be destroyed securely in accordance with best practice at the time.

Retention of Data

The Society may retain data for differing periods of time for different purposes as required by best practice. Statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

The Society may also store some data such as Minute Books, photographs, books and works indefinitely in its archive.

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