



## Data Protection Policy

### Definitions

Society, "Our", "We", "Us"	Cinque Ports Scribes or "CPS"
GDPR	The General Data Protection Regulations.
Responsible Person	The club secretary, on behalf of The Committee
Register of Systems	A register of all systems or contexts in which personal data is processed by the Society. Also known as a ROPA (Record of Processing Activity)
Data subject	The person to whom the personal data relates, "You"
Personal Data	<p>Any information relating to an identifiable natural person who can be directly or indirectly identified in particular by reference to an identifier.</p> <p>Examples of personal data: name, address, telephone numbers, email address, date of birth</p>
Special Categories of Data	<p>Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.</p> <p>The only special category of data collected by the Society relates to health issues that you have advised us about, for example dietary requirements for catering, a medical condition that may require reasonable adjustments, or you believe the committee should be made aware in case of incident.</p>



## 1. Data protection principles

The Society is committed to processing data in accordance with its responsibilities under the GDPR.

The purpose of the GDPR is to make the processing of personal data fair, transparent, and under the control of the data subject

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; reasonable steps must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by the Society and should be read in conjunction with the Society’s Fair Processing Notice.
- b. It does not apply to information you have provided directly to members or other individuals
- c. The Society is formed of a committee of volunteers who run the club on behalf of the members. They will take reasonable steps for maintaining data privacy.
- d. The Responsible Person shall take oversight for the Society’s ongoing compliance with this policy on behalf of the committee. They may be contacted through the website [www.cinqueportsscribes.org.uk](http://www.cinqueportsscribes.org.uk)

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- e. This policy shall be reviewed by the committee at least annually.
- f. The Society will only share your information with others in line with this policy, the Fair Processing Notice, if explicit consent has been obtained, or is required to do so by the law
- g. The Society is not required to register with the Information Commissioner's Office as an organisation that processes personal data, however will abide by general privacy principles in order to comply with GDPR

### 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Society shall maintain a Register of Systems / ROPA.
- b. The Register of Systems / ROPA shall be reviewed by the committee at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the society shall be dealt with in a timely manner.
- d. All forms which are used to obtain personal information will state what is optional and which are compulsory for processing, a fair processing notice.
- e. This policy and the fair processing notice will be available on the society's website [www.cinqueportsscribes.org.uk](http://www.cinqueportsscribes.org.uk) or by request

### 4. Lawful purposes

- a. All data processed by the Society must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Society shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available and will be actioned as soon as possible by the relevant committee member.
- e. In general, the Society relies on the "consent" and "contract" legal basis. We only collect the information needed to administer the society, its workshops, exhibitions and related activities. Information supplied by enquirers will be used to contact them in order to respond to their query.
- f. Explicit consent will be obtained where special categories of data are processed
- g. Transfer of data outside of the EU will only occur where explicit consent has been obtained from the individual. Possible reasons for this are participation in the Envelope Exchange where one or more participant is located outside of the EU, or where we need to advise visiting tutors of the names of attendees.

## 5. Data minimisation

- a. The Society shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 6. Accuracy

- a. The Society shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date such as annual membership forms and workshop/tutor booking forms.

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Society shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. For accounting and insurance purposes, personal information relating to payments shall be kept for the current year and 6 years. This includes workshop booking forms, and membership forms
- c. Consent forms which do not have any financial basis will be retained for as long as their purpose remains valid, and then destroyed after 1 year. For example, Tutor requests to appear on the website.
- d. A list of workshops, and the tutors who taught them will be retained for historical purposes, however contact details will be destroyed in line with the Society's policy mentioned above

## 8. Security

- a. The Society shall ensure that personal data is stored securely using appropriate software. Currently the Society uses a password protected folder system within DropBox that is limited to Committee members and (where relevant) members with special responsibilities approved by the Committee, who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- b. Due to the voluntary nature of the society personal data may be shared via a committee member's personal email address. This will only happen when necessary to conduct the legitimate interests of the Society.



- c. When personal data is deleted/destroyed this will be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Your rights

You have the right to:

- a. The right to be informed (*about the collection and use of your personal data*)
- b. The right of access (*to what personal information we hold on you, our data protection policy, and our fair processing notice*)
- c. The right to rectification (*correcting any errors*)
- d. The right to erasure (*where doing so does not conflict with any legal requirement*)
- e. The right to restrict processing (*limiting what we can do to it*)
- f. The right to data portability (provide it in a common format)
- g. The right to object (to some or all processing)
- h. Rights in relation to automated decision making and profiling. (CPS does not use automated decision making or profiling)

Please note that exercising some of these rights will mean that the Society is not able to inform you of any information regarding the club or its activities and you will therefore need to rely on information on the Society's website [www.cinqueportsscribes.org.uk](http://www.cinqueportsscribes.org.uk)

## 10. Data Breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Society shall promptly assess the risk to people's rights and freedoms, contact affected individuals, and if appropriate report this breach to the ICO.

## END OF POLICY

*Version control*

Date	Amendment	Page	Amended by
11/5/18	Footers and version control table added	1-5	TJW