

# Data protection & Privacy policy

## Context and overview

The Mytchett, Frimley Green and Deepcut Society (MFG&D Society) is a small, voluntary membership society representing the community interests of local residents. It holds contact details of members and community representatives which is used to keep them informed of society business and community matters. The data is not shared with any other organisation. Full details including contact information can be found at: [www.mfgdsociety.org.uk](http://www.mfgdsociety.org.uk)

## Key details

- Policy prepared by: Graham O'Connell
- Approved by the MFG&D Society on: 21st May 2018
- Policy operational from: 25th May 2018
- Next review date: March 2019 (and annually prior to AGM)

## Introduction

MFG&D Society needs to gather and use certain information about individuals. This includes members, local councillors and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data is collected, handled and stored to meet the society's data protection standards – and to comply with the law.

## Why this policy exists

This data protection policy ensures MFG&D Society:

- Complies with data protection law (see note below) and follow good practice
- Protects the rights of members and volunteers
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

# People, risks and responsibilities

## Policy scope

This policy applies to:

- All members of the MFG&D Society committee
- All volunteers, suppliers and other people working on behalf of MFG&D Society

It applies to all data that the society holds relating to identifiable individuals. This includes:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other personal or contact information

## Data protection risks

This policy helps to protect MFG&D Society from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the society uses data relating to them.
- **Reputational damage.** For instance, the society could suffer if hackers successfully gained access to membership data.

## Responsibilities

Everyone on the MFG&D Society committee has some responsibility for ensuring data is collected, stored and handled appropriately.

Each person that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Secretary or other person who stores the membership data
- The Chairman, temporary Chairman or President who determines what data should be held and by whom
- The Publicity Officer responsible for publicity, newsletters and other communications

## Data storage

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it. **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Computers should be **protected by strong passwords** and these never shared with other people.
- Data stored on committee members' computers should be kept in a **password protected folder**.
- Membership data should be **backed up frequently**. If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.

The committee is aware that as a small voluntary body it does not have the resources to employ expensive and complex data security tools. However, it takes its responsibilities seriously and will ensure that it is satisfied that all reasonable measures are being employed in implementing this policy.

## Data use

Using personal contact data is vital to the workings and 'legitimate interests' of the MFG&D Society. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft. So:

- Personal data will **not be shared informally**.
- Emails sent to multiple individuals will be sent **using the BCC facility** and not CC'ed.
- Personal data will **never be transferred outside of the European Economic Area**.
- Only those committee members that need access to contact details will **hold personal data to their computers**.
- **There is just one central record** of contact data and this will be regularly updated.

The law requires MFG&D Society to take reasonable steps to ensure data is kept accurate and up to date.

## Subject access requests

All individuals who are the subject of personal data held by MFG&D Society are entitled to:

- Ask **what information** the MFG&D Society holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.

- Be informed how the MFG&D Society is **meeting its data protection obligations**.

If an individual contacts the MFG&D Society requesting this information, called a subject access request, they will be required to provide proof of identity. A response will be provided with 28 days.

## Disclosing data for other reasons

In certain circumstances, the law allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, MFG&D Society will disclose requested data. However, the Chairman will ensure the request is legitimate, seeking assistance from the committee or legal advisers where necessary.

## Consent

MFG&D Society will ensure that individuals are able to opt in or opt out of being contacted by the society on general communications. However, as an integral part of membership, individuals may still be contacted about their membership status, fees, the annual general meeting and any other issue fundamental to their membership of the society.

Members will be contacted in May 2018 to inform them about the changes in the law, the introduction of this policy and inviting them to opt in to receive communications from the society.

- **A record of their consent or otherwise will be kept**, either as an email or a signed paper copy.
- **Anyone not responding may receive a reminder** but after that will not be contacted.
- For **anyone wishing not to be contacted**, their details will continue to be held but with a note of their preference attached.
- For **anyone wishing to be removed** from the society contact list, their contact details will be completely deleted with 28 days of that request.
- For **members leaving the society**, their data will be kept for no longer than 12 months and would usually be archived or deleted within 28 days.
- For **members failing to pay their membership fee for 4 consecutive years**, the society reserves the right to withdraw membership and delete their data. However, as a number of members fall into this category, the data may continue to be kept and used beyond this period at the discretion of the secretary.

**New members** joining the society will be asked to **sign a consent form** at the point of joining. This form will tell them how to find this policy, who to ask if they require more information and will describe how they may exercise their rights, such as at a later stage choosing not to be contacted.

## Data Breaches

In the event of a serious data breach MFG&D Society will inform the relevant regulatory authority within 72 hours and will inform those affected as soon as possible. Any other issues that are not required to be reported will be discussed at the next committee meeting and will be recorded along with any actions to be taken.

## Forms & Records

MFG&D Society membership enrolment form will be updated before May 2018. All forms and records will be maintained and stored by the MFG&D Society secretary.

### Note:

The **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). This comes into effect on 25th May 2018. The British Government has agreed that this will apply post-Brexit.

More information on GDPR can be found at [www.ico.org.uk](http://www.ico.org.uk)

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