



# Higher Denham Social Club Data Protection and Privacy Policy.

## **1. Introduction.**

Higher Denham Social Club [HDSC] is a not for profit, private members club which promotes social activities for the benefit of its members. Membership is open to local residents. HDSC retains the following types of data:

- Members names and business and/or home addresses
- Email addresses of members of the HDSC Management Committee
- Minutes of its management meetings
- Accounts, including, addresses and bank details of suppliers and other service providers
- CCTV images of people in the vicinity of HDSC premises.

## **2. Data Protection and Privacy Policy.**

### **a) Policy Statement**

HDSC as controller and a processor of the data, is committed to a policy of protecting the rights and privacy of individuals, HDSC members, suppliers and others who may interact with HDSC (Data Subjects) in accordance with the requirements of the General Data Protection Regulation 2018 (GDPR), which came into force on 25th May 2018.

The policy applies to all social club members and in particular members for the time being of the HDSC management committee.

As a matter of good practice, all individuals working on behalf of HDSC who have access to personal information, will be expected to have read and comply with this policy.

### **b) What this Privacy and Data Protection Policy Covers**

This Privacy Policy covers all personal information that is collected, used or otherwise processed in connection with membership or other interaction with HDSC. "Personal Information" means information about a Data Subject's location or which could be used to identify or defraud a Data Subject, such as their name, contact details and bank details.

### **c) Purpose of Holding Data**

Data may only held by HDSC for the following lawful purposes:

- Recording membership of HDSC and communication with members
- Event Promotion
- Realising the Objectives of the HDSC (e.g. Meeting minutes)



- Accounts & Records
- Informing committee members and group representatives of forthcoming meetings
- Payment for services rendered
- Security Protection (CCTV) of HDSC, People & Assets.

#### **d) Security**

Personal information records may be paper based or on computer. Paper based records are stored under lock and key and computer records are password protected.

Every effort is made to ensure personal data is maintained in a secure and protected manner. Only those members of the Management Committee (or supporting volunteers) have access to the data and access is limited to the specific tasks performed on behalf of the HDSC where the data is required.

#### **e) Processed for limited purpose**

HDSC will not use data for a purpose other than those agreed by Data Subjects and /or for protecting the security of HDSC.

#### **f) Limiting the Time Data is Retained**

HDSC discourages the retention of data for longer than it is required. HDSC will only retain personal data for as long as is necessary for the purposes for which it collected the information for, and so that its contractual and legal responsibilities and its legitimate business interests can be fulfilled. A review will be undertaken by the Management Committee at least annually to assess the need for retaining personal data.

Data required for accountancy purposes will not be kept for longer than 7 years.

Membership details will be destroyed within 12 months following a lapsed membership or immediately if a member notifies us in writing that they no longer wish to be identified.

CCTV data is automatically overwritten on a rolling 17-day basis.

#### **g) Rights in Relation to the Personal Data HDSC Holds**

Data Subjects have the right to access and correct personal data at any time, or to ask HDSC to restrict the processing of it, by contacting HDSC via one of the email addresses shown below. If a Data Subject's data is processed on the basis of consent, this consent may be withdrawn at any time, and/or the Data Subject may request erasure of the data. If a Data Subject thinks that HDSC is not processing their data correctly, they have the right to lodge a complaint.



Complaints will be investigated by the Chairman of the Management Committee and appropriate action taken.

**h) Accurate and up to date**

It is the responsibility of individuals and organisations (Data Subjects) to ensure that the data held by HDSC are accurate and up-to-date. HDSC will act upon notification of changes, or requests to delete data and will provide a copy of information held on a Data Subject if requested by that Data Subject.

**j) Publicity**

The existence of this Policy will be advertised in the community newsletter together with a statement that copies of the Policy are available on request. A similar notice will be posted on the community notice board and displayed in a prominent position in the community hall.

**3 Action to be Taken if this Policy is not Adhered to.**

If any member of the Management Committee, or other person with access to data, fails to follow this Policy the matter will be referred to the Chairman of the Management Committee who will at the earliest opportunity undertake an investigation and then take “appropriate action”. Appropriate action may be a discussion with the individual concerned, or rescinding the membership of the person concerned depending on the facts of the case and the seriousness of the particular case. Where a person disagrees with the action taken, they shall be entitled to have the case reviewed by the whole Management Committee whose decision shall be final.

**4. Adoption and Review.**

This policy has been drawn up in accordance with the General Data Protection Regulation 2018.

This Policy was approved by the Management Committee on \_\_\_\_\_ and is due for review every 3 years,

Signed \_\_\_\_\_ Chairman.

HDSC – Email \_\_\_\_\_