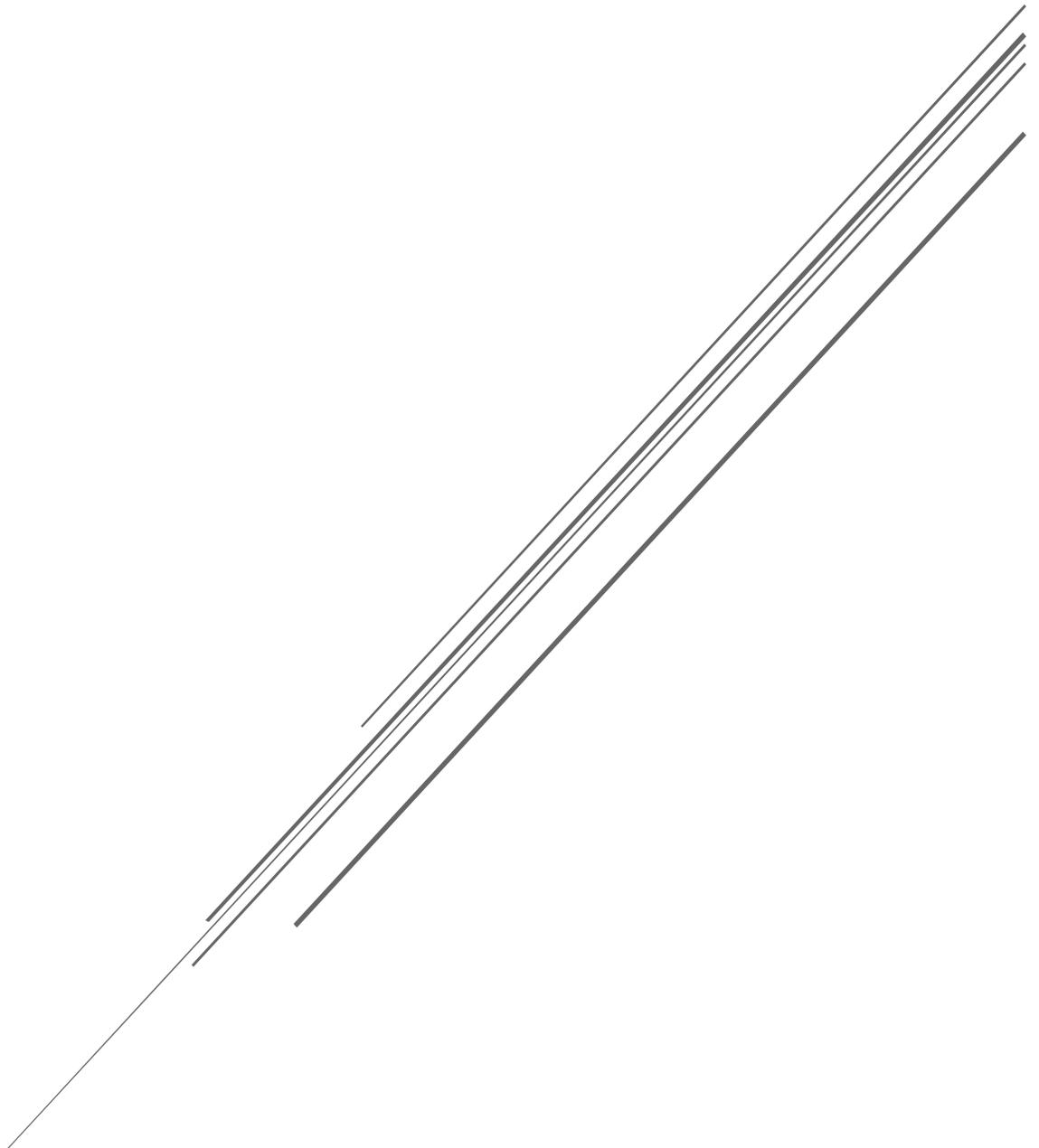


# DATA PROTECTION POLICY



Norfolk Record Society  
September 2018

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## 1. Background

On 25 May 2018, the EU General Data Protection Regulation (GDPR) came into effect. The GDPR attempts to protect individuals' privacy by mandating that all organisations holding or processing personal data be accountable for protecting the confidentiality, integrity and availability of that data.

The Norfolk Record Society ("The Society") understands the importance of the GDPR for protecting the rights of its members, officers and other individuals with whom the Society has contact. The Society takes these obligations seriously and in order to prepare for the introduction of the GDPR, it has reviewed its processes and developed this policy governing how and why we may collect, store and publish personal data.

This policy has been developed to ensure that:

- Society members and other individuals interacting with the Society have a clear understanding of how the Society may collect and use their personal information.
- All Society officers are aware of their responsibilities with respect to collection, storage and usage of personal data.
- The Society has good governance processes in place to monitor our compliance with the GDPR.

This policy has been developed using guidance published by several sources, notably, the Information Commissioners Office (ICO).

## 2. Data Protection Officer

Consistent with ICO guidance, upon implementation of this Policy, the Society will appoint a Data Protection Officer. The Data Protection Officer:

- 2.1. will have a 'watching brief to ensure that the Society and its officers are made aware of and are encouraged to observe good data collection, management and usage practices.
- 2.2. will be informed in the event of any suspected data breaches within the Society, and
- 2.3. will be the first point of contact in the case of any statutory or subject access requests.

Under normal circumstances, this function should not be particularly onerous and will be incorporated into the "duties" of an existing Society officer, as agreed by the Council.

The Society's Data Protection Officer will be the Treasurer.

### **3. Information about Members**

As a membership based organisation the Society collects and maintains database(s) of basic information on all our members. This data may include a member's name, address, email, phone number, subscription payment. This information is used to communicate with members, and otherwise to meet any other operational requirements of the Society (such as reclaiming Gift Aid).

Upon becoming a member of the society and at annual membership renewal, members will be made aware / reminded of the reasons why we collect this information and their rights as detailed below.

### **4. Information about Non-Members**

The Society's will also, on occasions, collect information on non-member individuals.

The Society obligations towards the information of these individuals will be similar to the obligations for members. However, given the "informal" relationship the Society has with these individuals, when collecting non-member information there must be a clear written agreement (such as by email) as to why the Society is collecting that information and how it will be used.

### **5. Management of Information**

The Society and its officers will, at all times, take good care to observe the confidentiality of member data in the collection, storage and usage of that data (such as using password protected and preferably encrypted files with member information, always using "blind copy" on mass emailing, etc...). If any Officers are in doubt about what measures are appropriate, they should consult with the Society's Data Protection Officer.

Any suspected breaches of data confidentiality should be brought to the attention of the Society's Data Protection Officer so that appropriate management actions can be agreed and taken.

### **6. Publishing Personal Information (Members)**

The Society will never publish contact information (such as in the annual report or on the website) of members without the explicit written consent of those members.

All Society Officers should also be aware that where any individuals are identified in other public forums (such as any published meeting minutes, newsletters and social media sites), the individuals should be informed that they are going to be potentially identified and given the option not to be identified.

The Society will never disclose or sell membership personal data to third parties, unless as required to meet its statutory obligations, such as to HMRC.

## **7. Publishing Officer/Trustee Information**

Members who become Officers or Trustees of the Society will, in many cases, need to have contact details published in order to carry out their duties effectively.

Upon becoming an Officer a member must be asked for, and provide, written consent as to which contact details he or she wishes to have published in the Volume, on the Society website or in other relevant media.

For those who are Trustees of the Society, their details will be registered with the Charity Commission which publishes trustee names (and only names) on its website (<https://www.gov.uk/government/organisations/charity-commission>).

## **8. Individuals' Rights**

Members will at all times have a right to opt permanently not to receive communications from the Society (by one or more means of communication). In these cases, the process for expressing such a wish should be simple and clearly defined, and the request should be complied with. In the case of new members, the right to opt out of communications should be made clear when they join the Society and when we initially collect their contact information (also see below).

Communications with our members will regularly remind them of their rights not to receive communications and how to go about exercising that right if they wish. For example, periodic emails from the Society to members should make these rights clear.

Any non-member (including former society members) will also have the right at any time to request that all data held on the Society databases about them should, where feasible, be deleted - i.e. they have a right to be "forgotten".

## **9. Approval and Future Update of this Policy**

This policy was agreed and approved at the Council Meeting on 27 September 2018.

Future updates to this policy will be agreed and approved by the Council and then published on our website as soon as possible after the meeting.