

Data Protection Policy

Scope of the Policy

This policy applies to the work of New Companions Camping Club (hereafter 'The NCCC'). The policy sets out the requirements that The NCCC has to follow so that it can gather personal information for membership purposes. The policy details how personal information will be gathered stored and managed in line with the seven GDPR principles. The policy will be reviewed on an ongoing basis by The NCCC committee members to ensure that The NCCC is compliant. This policy should be read together with The NCCC's Privacy Policy.

Why this policy exists

This data protection policy ensures that The NCCC:

- Complies with The General Data Protection Regulation (GDPR), that came into being in the UK on 25th May 2018, and follows good practice.
- Protects the rights of members, committee members and external agencies e.g. printers and distributors.
- Is open about how it stores, processes and shares members data.
- Protects itself from the risks of a data breach.

General guidelines for committee members

- The only people able to access data covered by this policy should be members of The NCCC and those who need to communicate with or provide a service to the members of The NCCC.
- Data should not be shared informally or outside The NCCC.
- Committee Members should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Personal data should not be shared outside The NCCC without prior consent and/or for specific and agreed reasons.
- Member information should be reviewed and consent renewed if the law changes or the needs of The NCCC change.

The Seven GDRP Principles

The GDPR sets out seven principles for the lawful processing of personal data. Processing includes the collection, organisation, structuring, storage, alteration,

consultation, use, communication, combination, restriction, erasure or destruction of personal data. Broadly, the seven principles are :

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

The principles are at the centre of the GDPR; they are the guiding principles of the regulation and compliant processing.

Data controllers are responsible for complying with the principles of the regulations. Data Controllers are also accountable for their processing and must demonstrate their compliance. This is set out in the new accountability principle.

The full version of the seven principles gives more detail about the principles and their application.

Personal data shall be:

(a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');

(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 ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step 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 ('accuracy');

(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 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 ('storage limitation');

(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 ('integrity and confidentiality')."

(g) kept with the NCCC committee being accountable for how personal data is used.

a) Lawful, fair and transparent data processing of personal data

The NCCC requests personal information from potential members and members for the purpose of sending communications about their involvement with The NCCC. The forms used to request personal information will contain a privacy statement informing potential members and members as to why the information is being requested and what the information will be used for. Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held. NCCC members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a NCCC member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.

b) Processed for Specified, Explicit and Legitimate Purposes

Members will be informed as to how their information will be used and the Committee of The NCCC will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about The NCCC's events and activities.
- Meet organisers communicating with members about specific meets.
- Sending members information about The NCCC's events and activities.
- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership.

- Publication of a Membership Directory so that members can communicate with each other.

The NCCC will ensure that meet organisers are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending NCCC members marketing and/or promotional materials from external service providers unless of direct benefit for the subject interests of the group.

c) Adequate, Relevant and Limited Data Processing

Members of The NCCC will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address.
- Email address.
- Telephone number(s).
- Membership renewal and original membership date.
- Payment method but not banking details.

d) Accurate and Current

The NCCC has a responsibility to ensure members' information is kept up to date. Members will be informed that they must let the membership secretary know if any of their personal information changes.

Every reasonable step will be taken to ensure that personal data of NCCC members is accurate, having regard to the purposes for which it is processed. If a member requests deletion, amendment, or data is no longer required then that data will be erased or rectified without delay.

e) Data Processing

Data will be kept in a form which permits identification of data subjects that will allow insertions, updates and deletions where necessary.

f) Security

NCCC Committee members and all other members will safeguard and protect all electronic data in their possession with a secure password. Where data is held in a printed format it must not be passed to any non-member or left where non-members could access or observe it.

g) Accountability and Governance

The NCCC Committee are responsible for ensuring that The NCCC remains compliant with data protection requirements and retain evidence to that effect. For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance. Committee Members shall also stay up to date with guidance and practice within The NCCC. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

Subject Access Request

NCCC members are entitled to request access to the information that is held by The NCCC. The request needs to be received in the form of a written request to the Membership Secretary of The NCCC. On receipt of the request, the request will be formally acknowledged and dealt with within 1 month unless there are exceptional circumstances as to why the request cannot be granted. The NCCC will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

Data Breach Notification

Were a data breach to occur action shall be taken to minimise the harm by ensuring all committee members are aware that a breach had taken place and how the breach had occurred. The committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The committee shall also contact the relevant members to inform them of the data breach and actions taken to resolve the breach. If a member contacts The NCCC to say that they feel that there has been a breach by The NCCC, a committee member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the committee member will ask The NCCC member to follow this up with an email or a letter detailing their concern. The concern will then be investigated by members of the committee who are not in any way

implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Privacy Policy

The New Companions Camping Club (hereafter 'The NCCC') treats your privacy rights seriously. This privacy policy sets out how we will deal with your 'personal information', that is, information that could identify, or is related to the identity of, an individual.

WHAT PERSONAL INFORMATION DO WE COLLECT?

When you express an interest in becoming a member of The NCCC you will be asked to provide certain information. This includes:

- Name
- Home address
- Email address
- Telephone number(s)
- Chronicle preferences (paper or email)
- Membership renewal and original membership date
- Payment method but not banking details

HOW DO WE COLLECT THIS PERSONAL INFORMATION?

All the information collected is obtained directly from you. This is usually at the point of your initial application. The information will be collected via membership application forms and renewal forms. At the point that you provide your personal information for the below membership purposes, we will also request that you provide consent for us to store and use your data. Your consent is required in order to ensure our compliance with data protection legislation (General Data Protection Regulation 25 May 2018) and without it we will not be able to send you NCCC information.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use your personal information:

- To provide the Chronicle magazine.
- For administration, planning and management of The NCCC.
- To communicate with you about meets.

- To monitor, develop and improve the provision of our NCCC meets. We may send you messages by email, other digital methods, telephone and post to advise you of NCCC meets.
- To produce a membership directory which is published to all members.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may disclose information about you, including your personal information:

- Internally – to committee members and meet organisers – as required to facilitate your participation in our NCCC activities.
- Internally – we put Members contact information on our website
- Internally – to other members to facilitate communications between members.
- Externally – we may arrange for NCCC products or services such as the printing and direct mailing of publications to be carried out by external providers.
- Externally – if we have a statutory duty to disclose it for other legal and regulatory reasons.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We need to keep your information so that we can provide our services to you. Your information will be retained for the duration of your membership and for 12 months thereafter. The exceptions to this are instances where there may be legal or insurance circumstances that require information to be held for longer whilst this is investigated or resolved. Where this is the case then the member/s will be informed of how long the information will be held and when it will be deleted.

HOW YOUR INFORMATION CAN BE UPDATED OR CORRECTED

To ensure the information we hold is accurate and up to date, members need to inform The NCCC of any changes to their personal information. You can do this by contacting the membership secretary at any time. On an annual basis you will have the opportunity to update your information via the optional membership renewal form. Should you wish to view the information that The NCCC holds on you, you can make this request by contacting the membership secretary. There may be certain circumstances where we are not able to comply with this request. This would include where the information may contain references to other individuals or for legal, investigative or security reasons. Otherwise we will respond within 1 month of the request being made.

HOW DO WE STORE YOUR PERSONAL INFORMATION?

Your membership information is held by the Membership Secretary and passed to committee members and meet organisers – as appropriate. Your application and renewal forms, together with any further documentation as detailed in our Data Protection Policy are held in paper files for the same periods as with our electronic system. The electronic files are password protected.

PHOTOGRAPHS

Photographs may be taken as a matter of record at NCCC events and may be published in newsletters or on the website. These photographs may include images of members. Members can request the removal from the website of photographs that include their image.

AVAILABILITY AND CHANGES TO THIS POLICY

This policy is available on our website and is provided to members in hard copy upon request. This policy may change from time to time. If we make any material changes we will make members aware of this via the chronicle or website and where appropriate seek revised consent from you.

CONTACT

If you have any queries about this policy, need it in an alternative format, or have any complaints about our privacy practices, please contact the membership secretary.