Maldon Angling Society (MAS) Data Protection Policy

Scope of the policy

This policy applies to the activities of the Maldon Angling Society, hereafter known as the Society. The policy sets out the requirements that the Society has to gather information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the Society's committee members to ensure that we are compliant. This policy should be read in tandem with the Society's Privacy Policy.

Why this policy exists

This data protection policy ensures the Society:

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members data
- Protects itself from the risks of a data breach

General guidelines for committee members and match secretaries.

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the Society members.
- The Society will provide induction training to committee members to help them understand their responsibilities when handling data.
- 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.
- Data should not be shared outside of the Society unless with prior consent and/or for specific and agreed reasons.
- Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be support from the Angling Trust and Fish Legal where uncertainties or incidents regarding data protection arise.

Data protection principles

The General Data Protection Regulation identifies key data protection principles:

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner

Principle 2 - Personal data must be 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.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

Principle 4 – Personal data held should be 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;

Principle 5 – Personal data must kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for the 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;

Principle 6 - Personal data must be processed in accordance and 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.

Lawful, fair and transparent data processing

The Society requests personal information from potential members and members for membership applications and for sending communications about their involvement with the Society. 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. The lawful basis for obtaining member information is due to the contractual relationship that the Society has with individual members. In addition, members will be asked to provide consent in writing for specific processing purposes. Society members will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received they will be acted upon promptly and the member will be informed as to when the action has been taken.

Processed for specified, explicit and legitimate purposes

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

- Communicating with members about Society events and activities
- Sending members information about the Society and Angling Trust 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 their membership

The Society will ensure that Society members are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending Association members marketing and/or promotional materials from external service providers.

The Society will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

Adequate, relevant and limited data processing

Members of the Society will only be asked to provide information on their contacts that is relevant for membership purposes. This will include:

- Name and Address
- Email address
- Telephone numbers
- Date of Birth

Where additional information may be required such as health related information this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

Where the Society organises an activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they don't wish to be in the photograph. Otherwise consent will be deemed to be obtained from members when filling in their joining and renewal forms for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact the Society's Membership Secretary to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

The Society has a responsibility to ensure members' contacts' information is kept up to date. Members will be informed to let the Society's Membership Secretary know if any of their contacts or contacts' personal information changes. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform the Society as to any changes in their contacts or contacts' personal information.

Accountability and governance

The Society's Committee are responsible for ensuring that the Society remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The Society Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held. When Committee Members relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

The Society Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong passwords
- Committee members not sharing passwords
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis
- Using password protection on laptops and PCs that contain personal information
- Using password protection or secure cloud systems when sharing data between committee members.
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

Subject Access Request

Society members are entitled to request access to the information that is held by the Society. The request needs to be received in the form of a written request to the Membership Secretary of the Society. On receipt of the request, the request will be formally acknowledged and dealt with expediently and within 30 days unless there are exceptional circumstances as to why the request cannot be granted. The Society 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. This will include ensuring that all the Society Committee Members are made aware that a breach has taken place and how the breach 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 Society members to inform them of the data breach and actions taken to resolve the breach.

Where a Society member feels that there has been a breach by the Society, a committee member will ask the member to provide an outline of the breach. If the initial contact is by telephone, the committee member will ask the Society member to follow this up with an email or a letter detailing their concern. The alleged breach will then be investigated by

members of the committee who are not in any way implicated in the breach. Where the committee needs support or if the breach is serious they should notify Fish Legal and The Angling Trust if appropriate The Society member should also be informed that they can report their concerns to these bodies if they don't feel satisfied with the response from the Society. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Policy agreed 01/10/2018

Policy Review date 01/10/2019