



The Vale of Evesham Historical Society

General Information Protection Regulation 2018

Policy and Code of Conduct: Society Members

1. The Society takes seriously its obligations to its members with respect to holding data about them, and strives fully to understand its legal obligations.
 - The Society Committee is identified as the Data Controller for the purposes of the Regulation
 - Each member of the Committee shall note what information they hold about members, and the means used to secure the data.
 - A Committee member shall be appointed with the responsibility to be familiar with the Regulation and its implications, and ensure that the Society complies. It is not considered necessary to appoint a Data Protection Officer under the terms of the Regulation.
2. The Society will only hold data about its members for the purposes of achieving its stated aims.
 - The Society shall *not* hold any data which may be considered sensitive or special category¹
 - The Society shall *not* hold any data relating to a child under 16 years old without the consent of a parent or legal custodian².
3. It is a condition of membership of the Society that members allow the Society to hold a minimum of information about them, including their names and means of contact (postal address and either e-mail address or telephone number) and class of membership.
 - Any other information is considered voluntary and shall be erased on a request by the member.
4. The Society shall identify any risks to data security and shall take whatever action it considers necessary to secure and protect the privacy of members' information.
 - Any physical or paper file shall be kept in secure storage
 - Any computer file containing such data shall be password-protected beyond any measure to secure the computer itself.³
5. No data held by the Society about its members will be passed to a third party without the specific permission of the member.
6. A member may, at any time, request and be given a copy of the data that the Society holds about that member.
 - If different files hold different information about an individual, the data will be collated before being returned to the member.

¹ For example, information on a member's race, ethnic origin, politics or religion, health, or personal life.

² This is not expected to apply unless a child is included with a parent in a joint membership. The requirement under the Regulation relates to a child under 13 years

³ This includes any back-up file and – in particular – any file held in off-site or cloud storage.

7. A member may request amendments or corrections to data held by the Society about them, and the Society shall act upon such request.
8. A member may request data held by the Society to be erased, other than the minimum specified in Clause 3 above, and the society shall act upon such request.
9. If a member ceases to be a member of the Society, any data held about that member shall, where practicable, be deleted from the Society's records⁴ no later than **two** years afterwards.
10. The Society will use and process data about members only for legitimate purposes. In particular, it will use the data to contact members only if:
 - it is in the legitimate interest of the Society, or the member, for it to do so or
 - if the member has given specific consent.
11. The Society shall act promptly and appropriately upon a complaint by a member with regard to its handling of their personal data.
12. A member has the right to make a complaint about our handling of their personal data to the Information Commissioner's Office.
13. In the event of any breach of the security of personal data, the Society shall promptly
 - act to rectify the breach
 - report the breach to the member(s) affected and
 - if the breach is considered sufficiently serious, report to the Information Commissioner's Office within 3 days of the event.
14. The Society shall keep a log of events related to the management of personal data, including:
 - Training attended and other sources of advice
 - Audits of compliance: data held and security measures taken
 - Requests for data to be changed, corrected or deleted
 - Breaches of security

⁴ It may not always be possible to delete all information. For example, early issues of the "Almoners Pen" include lists of those who were members at the time.