

Friends of Headington Hill Park

Data Protection Policy

Introduction

The data that members provide the Friends of Headington Hill Park (Friends) are kept in documents that are held and processed both as hard copy and electronically. This means that the Friends are subject to the **General Data Protection Regulation 2016 (GDPR)** which came into force in the UK on 25th May 2018. It replaces the Data Protection Act 1998 and will harmonise data protection law throughout Europe. Under GDPR we have responsibilities of care to uphold. This document outlines our policies.

What sort of data we hold and how are they held?

What data do we keep?

We are only allowed to keep data that are necessary for our Friends activities. We keep some or all the following:

- 1. Name**
 - 2. Email address**
 - 3. Postal address**
 - 4. Landline phone number and/or mobile phone number**
- The Friends uses electronic spreadsheets to manage personal data (including membership and finances). These spreadsheets are held securely on cloud servers or on individual Committee members' computers and are emailed between Committee members on a need-

to-know basis.

- When you pay money to us (for example, your subscription or a donation), we may keep a record of your payment and what it was for, together with name (or payment reference).
- Committee meetings are held at intervals. Committee minutes, which may include member names, are emailed to Committee members. However, these minutes do not include personal data if posted on noticeboards and website.
- The minutes of the Friends AGM, including names of attendees, are posted on our website.
- Our bank account is with NatWest. Committee members who are signatories on the bank account are able to see NatWest statements

Confidential or sensitive information

- Members may occasionally disclose confidential information to the Committee, for example if illness or family problems. These disclosures will not be recorded.
- This information is only shared between Committee members, and only on a 'need to know' basis.
- You are the source of your own personal information, initially from when you joined the Friends, and then any changes that you notify us about. We will endeavour to maintain accurate records, but we rely on members keeping us up-to-date.

- **Email usage**
- The Friends use email to handle most administration and communication tasks.
- The Association Chair and Membership Secretary, who are responsible for bulk emails have email accounts used for this purpose (fohhp.treasurer@gmail.com & fohhp.memsec@gmail.com) All initial email traffic to the committee is on one of these accounts.
- These accounts contain members' email data.
- In cases of bulk emailing (e.g. to send out notice and paperwork for the AGM), we make sure to use the Blind Carbon Copy (Bcc:) function to ensure other members' email addresses are not visible.

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What is the data used for?

The data are only used for legitimate Association uses; these include:

- Communication between committee members and other members as part of the daily running of the Friends
- Notification of Friends meetings and events including any minutes of those meetings

- Provision of news to The Friends.

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What is the data NOT used for?

- We will not disclose the data of Friends to other members or to third parties or use it on behalf of third parties.

- **Our legal basis on which we hold your personal data**
- GDPR data protection law has six possible bases on which to hold personal data, including Obtaining Consent, and as Legitimate Interests.
- Like other membership organisations we hold your personal data on the basis of 'Legitimate Interests'.
- This is defined as meaning in ways one would “*reasonably expect ... and which have a minimal privacy impact, or where there is a compelling justification for the processing*” such as being able to communicate with our members –
- See: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>).

Who can hold, process or access personal data and how long are data retained? Who has access to the data?

- Only those who need access to the data have access and they do not share it with anyone else.
- The following Committee members have access to the full membership data: Chair, Membership Secretary, Treasurer.
- The names of all Committee members are in the public domain. It is occasionally necessary for their contact details to be shared with outside bodies,

- **How do we protect the data?**
- Data are held as documents on password-encrypted computers and data is stored on a GDPR- compliant Cloud server
- Mobile (“smart”) phones are sometime used for email purposes. Phones are vulnerable to loss and theft so if they are used for Friends business they must at least use a 4-character PIN.
- Spreadsheets containing multiple records will not be kept on phones.
- **What happens when a member leaves the Association?**
- We do not keep data that is not needed for operation of the Friends. The data for members who leave is usually held for at most 6 months, or the remainder of that financial year, after which time it will be deleted from our records.
- We keep the data for a short period in the event that we need to communicate with a member who has recently left, and only for the purpose of resolving any outstanding matters.

Data Policy Implementation

- A nominated member of the committee is responsible for ensuring that this policy is adhered to.
- The **GDPR Data Controller** is the Membership Secretary who will undertake this role.
- Other Committee members act as **GDPR Data Processors** – collecting data e.g. from new Friends or at subscription renewal time.

- ## Your rights

- Data protection law gives you certain rights. Full details are available on the Information Commissioner's website.
 - For a small organisation like ours with relatively simple records, the relevant rights are for you to see your record and to correct any errors in it. Members can at any time ask the Chair or Membership Secretary for a copy of their recorded data. To request this, send an email to fohnp.memsec@gmail.com
 - When you renew your subscription in April of each year you can check the information we hold on you is correct.
 - You also have a right to complain to the supervising authority, ie. to The Information Commissioner's Office (ico.org.uk).
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