



## **Introduction**

The General Data Protection Regulation (GDPR) of 2018 promotes high standards in the handling of personal data and enhances an individual's right to privacy. This is in accordance with the eight principles of good data handling, by **all** sections of the community and thereby protect an individual's right to privacy.

The Club, its Officers and Members or others who use or process personal will comply with the data protection principles on good data handling.

These principles say personal information must be:

- Fairly and lawfully processed
- Processed for specified purposes
- Adequate, relevant and not excessive
- Accurate and kept up to date
- Not kept for longer than is necessary
- Processed in line with the rights of the individual
- Kept secure
- Not transferred to countries outside the EEA unless there is adequate protection for the information

## **Registration**

1. The Ford Cortina MKII Owners Club is a "not for profit" organisation and as such is eligible for exemption from registration under the act.
2. As a direct consequence of exemption, the Club will only process personal data for the purposes of:
  - a. Establishing or maintaining membership
  - b. Supporting a not -for-profit body or association: or
  - c. Providing or administering activities for either the members or those who have regular contact with it.

## **Definitions**

1. A "Data Controller" is a person who alone, jointly or in common with other persons within the Club, determines the purposes for which and the way any personal data are processed or are to be processed. Within the Club, the Directors are jointly the Club's Data Controller.
2. "Officials" include anyone who holds or processes information on behalf of the Club. At National level it includes Directors, Event Organisers and others involved in Club National business. However, it also includes all those involved in working on the Club's behalf on committees or organising events at local level.
3. "Members" are those who are members of the Club, or associated with it, and who's personal data may be held by the Club. This may include past, present and potential members.
4. "Officials", "Members", "Others" and "Third Parties" may include contractors, suppliers, contacts, referees, friends or family members.
5. "Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

## **Notification of Data Held**

1. The Club shall notify all officials, members and other relevant data subjects of the types of data held and processed by the Club concerning them, and the reasons for which it is processed. When processing for a new or different purpose is introduced, the individuals affected by that change will be informed through the Club.

## **Officials' Responsibilities**

1. All Officials of the Club who hold or process information about Members or Other Data Subjects (for example, membership information, event booking information, Club sales information or other personal details), must comply with the Data Protection Policy.
2. Officials holding data shall ensure that:
  - a. all personal information is kept securely;
  - b. personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party.
  - c. any breach be immediately reported to the Committee.

## **Members' Responsibilities**

1. All members shall:
  - a. ensure that all personal information which they provide to the Club is accurate and up-to-date;
  - b. inform the Club of any changes to that information, for example, changes of address;

- c. check the information which the Club shall make available from time to time, in written or automated form, and inform the Club of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The Club cannot be held responsible for errors of which it has not been informed.

### **Rights to Access Information**

1. Officials, members and other data subjects in the Club have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to the Club.
2. The Club aims to comply with requests for access to personal information as quickly as possible, but it will ensure that it is provided within 20 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the Club to the data subject making the request.

### **Subject Consent**

1. The Club does not and will not handle or process sensitive personal data (as described in the act) but will nonetheless actively seek the consent of its existing membership in order to continue to hold and process their data.
2. All new members will be asked to sign their application form on joining the Club giving consent for the Club to hold and process their personal data.

### **The Data Controller and the Designated Data Protection Officer**

1. The Club Directors are jointly the Data Controller under the Act and are ultimately responsible for its implementation.
2. The Club is not required to have a designated Data Protection Officer.

### **Retention of Data**

1. The Club will keep different types of information for differing lengths of time, depending on legal, operational and archive requirements.
2. Any member may request that all data held in respect of themselves be removed from the Club's database by contacting the Membership Secretary.

### **Compliance**

1. Compliance with the GDPR is the responsibility of all Club officials and members. Any deliberate or reckless breach of this Policy may lead to legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Club Secretary.
2. Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with the Club Secretary.

### **Status.**

This policy is subject to annual review and was last reviewed on 18.05.18.