

# General Data Protection Regulations Policy - Lisle Combe

February 2019

## Introduction

Lisle Combe is committed to a policy of protecting the rights and privacy of individuals that we at Lisle Combe need to collect and use certain types of Data in order to carry out our work. This personal information must be collected and dealt with appropriately in accordance with the General Data Protection Regulations (GDPR) which came into effect on 25th May 2018.

Personal data can be held on computer or in a manual file, and includes email, minutes of meetings, records and photographs.

The owners of Lisle Combe, who have access to personal information, will be expected to read and comply with this policy document and follow the data protection procedures.

## Purpose

The purpose of this policy is to set out Lisle Combe's commitment and procedures for protecting personal data. Lisle Combe regards the lawful and correct treatment of personal information as very important to our successful working, and to maintaining the confidence of those who we have contact with.

## Data Protection Legislation

The GDPR have a number of key principles relating to the processing of personal data which we at Lisle Combe will comply with. The principles are:

- a) that the data is processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that any personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;

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 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; and

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.

The GDPR introduces specific requirements which are different from the current Data Protection Act. These are:

- The need to obtain explicit consent from persons whose data is being collected and to be clear as to how and for what purpose this data will be used. If data is being collected for more than one purpose each purpose must be clear and obtain explicit consent.
- A new 'right to be forgotten' whereby any person whose data is held by us can at any point demand that we erase their data from our records.
- The right for an individual to obtain a copy of all the information that is held on them by an organisation.
- The requirement to report any suspected breaches of data protection where these 'result in a risk for the rights and freedoms of individuals' to the Information Commissioner within 72 hours of them occurring.
- Potential significant increases in penalties for any proven non compliance.
- A requirement to have 'privacy by design' where data protection considerations are built into the design of new systems from the outset.

### **Ensuring Data Protection within Lisle Combe**

The following is a current list of data sets held by the Lisle Combe where details of individuals are recorded:

- A. **Guest Database** - a password protected spreadsheet containing names, addresses, telephone numbers, email addresses and records of the type visit.

- B. **Membership details for other members with the Farm and Country Holiday Group.** Each member will be given annually a list of other group members for the purpose of passing on any enquiries to them. This list should not be passed onto any other person not a member, and should be kept in a safe place. It should be destroyed annually when a new list is published in March of each year. Members must undertake to destroy the members list once they cease to be a member.
- C. **Guest Email List** - used by the creation of a circulation list to send messages to Lisle Combe members.
- D. **Facebook Friends** - People who have subscribed to our Facebook Page to see our posts about events and activities.
- E. **Enquiries received via our website** - will be dealt with accordingly and then deleted if no booking/contact required afterwards.

## **Responsibilities**

Lisle Combe is legally responsible for complying with law, which means that it determines what purposes personal information held will be used for.

Lisle Combe will take into account legal requirements and ensure that it is properly implemented, and will through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised
- Take appropriate technical and organisational security measures to safeguard personal information
- Establish procedures for responding to requests for information.
- Lisle Combe uses but can not be held responsible for the security of partner organisations such as Mailchimp, Eviivo and various OTA.

Data protection Policy will be reviewed every year in recognition of the importance placed on this issue by Lisle Combe.

## **Data Collection**

### ***Informed consent***

Informed consent is when

- a person clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- and then gives their consent.

Lisle Combe will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Lisle Combe will ensure that the Data Subject:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing
- Grants explicit consent, preferably in written form or alternatively verbally for data to be processed
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used

## **Data Storage**

Information and records relating to individuals will be stored securely and will only be accessible to authorised persons.

Information will be stored for only as long as it is needed or if applicable required by statute and will be disposed of appropriately.

It is Lisle Combe's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to data protection law.

## **Data Subject Access Requests**

### **Disclosure**

Lisle Combe does not share personal data with third parties. If this were to change at any point in the future we would not do so without first obtaining the consent of the individual.

Lisle Combe regards the lawful and correct treatment of personal information as very important to our successful working, and to maintaining the confidence of our membership and those with whom we deal.

Lisle Combe intends to ensure that personal information is treated lawfully and correctly.

Should we receive any requests from an individual to obtain a copy of any data which we hold on them, we will aim to action as quickly as possible and certainly within one calendar month.

### **Risk Management**

The consequences of breaching Data Protection can cause harm or distress to individuals if their information is released to inappropriate people, or they could be denied a service to which they are entitled. This policy is designed to minimise the risks and to ensure that the reputation of Lisle Combe is not damaged through inappropriate or unauthorised access and sharing.

### **Destroying personal data.**

Personal data should only be kept for as long as it is needed i.e. only keep that data for the duration of administering an event or project or for the purposes of dealing with an individual's membership. We will ensure that this information is confidentially destroyed.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Review Date: \_\_\_\_\_