

# DATA SECURITY AND PRIVACY

---

## 1. Introduction

The safety of personal information is of concern to everyone and Eastbourne PROBUS Club is determined that its practices shall fully conform to the requirements of the General Data Protection Regulation (GDPR) which is the legal authority in this area.

## 2. The GDPR

The essence of the GDPR is straightforward. It states that an organisation can collect and process personal data provided that:

- this is done with the consent of the individuals affected and it must be possible for this consent to be withdrawn at any time.
- it is in the legitimate interests of the organisation.
- It is necessary for the performance of the contract with the individuals affected.

The regulation requires the appointment of a Data Controller to establish and oversee the implementing rules.

## 3. Data Controller

For Eastbourne PROBUS Club, the Club Committee is the Data Controller. However, the day-to-day practical operation of the rules is assigned to the Secretary to whom all queries and concerns should, in the first instance, be directed.

## 4. Collection, Storage and use of Data

It is Club policy that minimal personal information is collected, and this is all taken from a Member's application form. It comprises essential information (contact details, needed to keep members in touch with events) and information that supports Members in gaining the most from their membership (past profession, interests and hobbies, name of spouse/partner). Consent to the collection and storage of this data is confirmed by signature of a form that details the information held.

The information is held centrally by the Secretary on a secure computer with memory stick backup. From time to time the information is distributed to Members on a printed document (the Register of Members) as this presently provides the greatest security for the data. Email is used to distribute time-sensitive information

and email addresses are protected to the extent possible by use of the Blind Carbon Copy (bcc) facility. This website may be used for similar purposes.

The original application forms and the consent forms are preserved throughout the period of membership.

Information is used solely to support the aims of the Club and will never be divulged for marketing or similar purposes. From time to time, names may be passed to third parties in connection with Club outings, lunches and similar events.

Members may pass updates or corrections to the Secretary at any time. Such changes will be implemented within 28 days.

Photographs form another category of personal information under GDPR if the subjects are identifiable. Photographs may be taken occasionally for publicity purposes and may be published in local media or on this website. Whenever the subjects are identified by name (for example on change of Chairman), oral permission to publish will be obtained as a matter both of GDPR compliance and normal courtesy.

## **5. Duration of Storage**

Centrally stored data will usually be deleted within 28 days of membership ceasing; however the Data Controller reserves the right to extend this period for a limited time should circumstances so dictate.

Minimal information (names, dates of membership, reason for leaving and Club positions held) will be archived indefinitely as part of the history of the Club unless the member explicitly requests otherwise.

The Club ceases to have control of information once it has been distributed to the membership or in the case of photographs, to the local Press.

## **6. Resolution of Disputes**

Members dissatisfied with the Club's use of their information should first contact the Secretary. Should satisfaction not be forthcoming, they have the statutory right to contact the Information Commissioner's Office (see website [ico.org.uk/concerns](http://ico.org.uk/concerns)) for advice.