

Dudley Radio Car Club –

Data Protection and Data Retention Policy (last updated 01/12/2017)

Statement of policy and purpose of Policy

1. Dudley Radio Car Club (the Club) is committed to ensuring that all personal information handled by us will be processed accordingly to legally compliant standards of data protection and data security.
2. The purpose of this policy is to help us achieve our data protection and data security aims by:
 1. notifying our members of the types of personal information that we may hold about them and what we do with that information;
 2. ensuring members understand our rules and the legal standards for handling personal information relating to members and others: and
 3. clarifying the responsibilities and duties of members in respect of data protection and data security.
3. This is a statement of policy only. We may amend this policy at any time, in our absolute discretion.

Who is responsible for data protection and data security?

4. Maintaining appropriate standards of data protection and data security is a collective task shared between us and you. This policy and the rules contained in it apply to all members of the Club, including all members, committee members, and any volunteers (**Members**).
5. Dudley Radio Car Club committee has overall responsibility for ensuring that all personal information is handled in compliance with the law.
6. All Members have personal responsibility to ensure compliance with this policy, to handle all personal information consistently with the principles set out here and to ensure that measures are taken to protect the data security. The committee has special responsibility for leading by example and monitoring and enforcing compliance.
7. Any breach of this policy will be taken seriously and may result in appropriate action.

What personal information and activities are covered by this policy?

8. This policy covers personal information:
 1. which relates to a living individual who can be identified either from that information in isolation or by reading it together with other information we possess;
 2. is stored electronically or on paper in a filing system;
 3. in the form of statements of opinion as well as facts;
 4. which relates to Members (present, past or future) or to any other individual whose personal information we handle or control;
 5. which we obtain, hold or store, organise, disclose or transfer, amend, retrieve, use, handle, process, transport or destroy.

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What personal information do we process about Members and what do we do with it?

9. We collect personal information about you which:
 1. you provide or we gather before or during your membership with us;
 2. is in the public domain.
10. The types of personal information that we may collect, store and use about you include records relating to your:
 1. home address and contact details;
 2. telephone, email, internet, fax or instant messenger use;
 3. any disciplinary matters, grievances, complaints or concerns in which you are involved.
11. We will use information to run the club and to deal with any problems or concerns you may have including:
 1. **Member Address Lists:** to compile and circulate lists of home address and contact details, to contact you outside working hours.
 2. **Disciplinary, grievance or legal matters:** in connection with any disciplinary, grievance, legal, regulatory or compliance matters or proceedings that may involve you.
12. We confirm that that for the purposes of the Data Protection Act 1998, the Club is a Data Controller of the personal information in connection with your membership. This means that we determine the purposes for which, and the manner in which, your personal information is processed.
13. If you consider that any information held about you is inaccurate then you should tell the committee and, if we agree that the information is inaccurate then we will correct it. If we do not agree with the correction then we will note your comments.
14. We will take reasonable steps to ensure that your personal information is kept secure, as described later in this policy and in general, we will not disclose your personal information to others outside the Committee. However, we may need to disclose personal information about Members:
 1. to comply with our legal obligations or assist in a criminal investigation or to seek legal or professional advice in relation to employment issues, which may involve disclosure to our lawyers, accountants or auditors and to legal and regulatory authorities, such as HM Revenue and Customs;
15. By providing your personal information to us, you consent to the use of your personal information in accordance with this policy.

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Data Protection Principles.

16. Members whose work involves using personal data relating to Members or others must comply with this policy and with the eight legal data protection principles which require that personal information is:
 1. **Processed fairly and lawfully.** We must always have a lawful basis to process personal information. In most (but not all) cases, the person to whom the information relates (the **Subject**) must have given consent. The Subject must be told who controls the information (us), the purpose(s) for which we are processing the information and to whom it may be disclosed.
 2. **Processed for limited purposes and in an appropriate way.** Personal information must not be collected for one purpose and then used for another. If we want to change the way we use personal information we must first tell the Subject.
 3. **Adequate, relevant and not excessive for the purpose.**
 4. **Accurate.** Regular checks must be made to correct or destroy inaccurate information.
 5. **Not kept longer than necessary for the purpose.** Information must be destroyed or deleted when we no longer need it.
 6. **Processed in line with Subjects' rights.** Subjects have a right to request access to their personal information, prevent their personal information being used for direct-marketing, request the correction of inaccurate data and to prevent their personal information being used in a way likely to cause them or another person damage or distress.
 7. **Secure.** See further information about data security below.
 8. **Not transferred to people or organisations situated in countries without adequate protection.**

Data security

17. We must all protect personal information in our possession from being accessed, lost, deleted or damaged unlawfully or without proper authorisation through the use of data security measures.
18. Maintaining data security means making sure that:
 1. only people who are authorised to use the information can access it;
 2. information is accurate and suitable for the purpose for which it is processed; and
 3. authorised persons can access information if they need it for authorised purposes.
19. By law, we must use procedures and technology to secure personal information throughout the period that we hold or control it, from obtaining to destroying the information.

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20. Personal information must not be transferred to any person to process (eg while performing services for us on or our behalf), unless that person has either agreed to comply with our data security procedures or we are satisfied that other adequate measures exist.
21. Security procedures include:
 1. **Physically securing information.** Any desk or cupboard containing confidential information must be kept locked. Computers should be locked with a password or shut down when they are left unattended and discretion should be used when viewing personal information on a monitor to ensure that it is not visible to others.
22. **Telephone Precautions.** Particular care must be taken by Members who deal with telephone enquiries to avoid inappropriate disclosures. In particular:
 1. the identity of any telephone caller must be verified before any personal information is disclosed;
 2. if the caller's identity cannot be verified satisfactorily then they should be asked to put their query in writing;
 3. do not allow callers to bully you into disclosing information. In case of any problems or uncertainty, contact the committee.
23. **Retention of Data.** The Club will keep some forms of information for longer than others. Information should not be kept indefinitely, unless there are specific requirements.
 1. In line with principle 5 of the data protection act information should not be kept longer than is necessary. Our schedule for the retention of various types of data are as follows:
 1. Full Membership Record – Current Year
 2. Name / Email – While opted in
 3. Financial Records – Current Year + 6 Years
 4. Complaints – Current Year + 6 Years
 5. Contractual Agreements – Life of contract + 6 Years
 6. Committee Papers – Current Year + 6 Years
 7. Data Protection/FOI requests – Current Year + 6 Years
 8. Health and Safety records – Current Year + 50 Years
 2. When data is no longer required and retention period reached it should be appropriately destroyed.
24. **Methods of disposal.** Copies of personal information, whether on paper or on any physical storage device, must be physically destroyed when they are no longer needed. Paper documents should be shredded and CDs or memory sticks or similar must be rendered permanently unreadable.

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Subject access requests

25. By law, any Subject (including Members) may make a formal request for information that we hold about them, provided that certain conditions are met. The request must be made in writing.
26. Any member who receives a written request should forward it to the committee immediately.