

Hoylake Photographic Society

GDPR Policy and Compliance Statement

This outlines GDPR (General Data Protection Regulation) responsibilities and how HPS (the Society) meets those requirements.

GDPR 2018 requires that –

1. a Controller shall be responsible for, and be able to demonstrate, compliance with the principles and a Processor uses the data in an appropriate and lawful manner.
2. Consent - consent under GDPR

The Society is required to ensure it has clear and unambiguous consent for every potential legitimate use of the Members data,

Consent must be recorded in a separate document – HPS has consent as an addendum to the Membership form. HPS requires consent to be in the form of a signature, and date. (*GDPR does not allow this to be in the form of a Tick box*).

3. Records

HPS must keep records to demonstrate individual Members consent, date consenting and whether at a later date they have withdrawn consent. Members have the right to withdraw consent at anytime, contact the Controller and the relevant Processor.

Controller – The Hon Treasurer/Membership Secretary controls the personal data: acquisition, quality, storage and disposal.

Processors – Hon Secretary, Competition Secretary, Information Officer, Webmaster - Manipulates data to enable communication with the Member such as sending emails, newsletters and for website management

The joint responsibilities are:

- (a) data is processed lawfully, fairly and in a transparent manner in relation to individuals;
- (b) data is collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- (c) data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

Information collected and the legal basis for it is identified in the Hoylake Photographic Society Privacy notice.

- (d) data is accurate and, where necessary, kept up to date:

Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay.

Members are required to notify Membership Secretary of any changes to legally held data

Processes for individuals to view and correct their personal data held by the Society are outlined in the Hoylake Photographic Society's Privacy Notice

- (e) kept in a form which permits identification of data subjects (Members) 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;

The terms for data storage are: no longer than six years for Members information and two years for email marketing communication, this is to meet the requirements in the event of a tax audit by HMRC and data will be destroyed after this.

(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

Personally identifiable data is expected to be handled with care and consideration in line with GDPR by all Committee Members and third parties who come into contact with it. It should be secured and used only in line with its agreed purposes.

In the event of a data breach the Hoylake Photographic Society committee will investigate the causes, inform individuals affected and provide them with appropriate information and actively seek to prevent further occurrences in the future.

Training and Review *Before these documents are published on the Hoylake Photographic Society website some training and review is required to be undertaken.*

Ideally this should be the first committee meeting after the AGM to allow for any change in officers of the committee. Additional training will be provided on request for anybody who needs it. This will also be the opportunity to check that all data is cleansed after 6 years.

Once per year a portion of a committee meeting will be dedicated to:

- reviewing the principles of GDPR compliance
- reviewing changes to the organisation and its processes and whether this has an impact on data protection and GDPR
- assess and provide the necessary training needs associated with protecting and managing individuals' data in line with GDPR requirements.

This policy was agreed by Committee officers at the Committee Meeting held on 08/08/2023

It will be reviewed no later than 30/04/2024.