

Lions Club of Maidenhead CIO

Data Protection Policy

Introduction

As of 25th May 2018, the UK has UK specific data protection legislation – the Data Protection Act 2018, General Data Protection Regulations (GDPR), and e-privacy regulations, as well as fees Regulations. The Information Commissioner's Office (ICO) is the supervisory authority in the UK. To be compliant with UK data protection legislation the club has introduced the following policies and practices, as advised by the MD Data Protection Officer Lion Robyn Banks, a professional in the field.

Principles of Data Protection

The UK GDPR sets out seven key principles which we must follow:

- **Lawfulness, fairness and transparency**
Data must be collected and processed legally and fairly
- **Purpose limitation**
Data should only be used for specific, stated purposes
- **Data minimisation**
Only necessary data should be collected
- **Accuracy**
Data must be accurate and kept up to date
- **Storage limitation**
Data should not be kept longer than necessary
- **Integrity and confidentiality (security)**
Data must be kept safe and secure.
- **Accountability**
Data protection must take into account individuals' rights

Retention of information

Accordingly, all data is to be held only as long as necessary to carry out the purpose for which is obtained or required by law. Data no longer required should be securely deleted or otherwise destroyed.

Registration with the Information Commissioner's Office

The club has registered with the ICO as an organisation that processes data, and will continue to do so annually.

Documentation required

1) Accountability

Under the GDPR, clubs are now required to keep an "Accountability" document within their administrative documentation. This document needs to contain certain elements, as below. This statement will be saved as part of our data protection policy, in the members' area of the club website and also by the club Secretary.

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PRIVACY & COOKIES

Maidenhead Lions Club CIO is a charitable volunteer organisation working as part of Lions International. We can be contacted via the contacts page on the website, or via telephone on 0345 833 5793. We are also on Facebook. We process “personal data” and/or “special category data” (as defined in data protection legislation) as part of the membership services, fund-raising and/or in our administration. All data are held securely and for as long as they relate to the reasons for collection and/or if there is a statutory retention period. Security of data and confidentiality are very important to us to protect everyone involved in our services. If we want to use your photograph to show people what great fun we have fund-raising and promote what we do, we will ask your permission.

Data may be shared with third parties as part of our services, for our administration and/or if we are required by law to do so. We cannot accept any liability for any processing conducted by a third party outside our remit.

There are technical security measures in place – encryption where necessary and restriction of access to data to maintain integrity and privacy. Organisational measures such as access to manual data are in place.

We are particularly aware that we share data to our parent organisation, LCI, which is based outside the European Economic Area (EEA). LCI are aware of their obligation to protect Members personal information and have made commitments to UK Lions to this effect. There is a data retention schedule in place. Data are held in UK based systems, even if accessed remotely. There is a Data Sharing Agreement in place for data held on MYLCI. All feasible security measures have been addressed to ensure security of the data of UK Lions.

Recipients of data may be the data subject and/or third parties as outlined in the Privacy Notice. Sharing of data is carefully considered given the nature of our services.

The “data retention schedule” mentioned above is a working document held separately by the Data Protection Compliance Officer in order that it may be updated as necessary.

2) Privacy Notice

This is displayed on the club website under its own tab “Privacy & Cookies”. It is the main Privacy Notice for the club, with others appearing on the footer of emails and forms that collect data:

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As part of our compliance, we have conducted a cookie audit on our website. Cookies are internet files used by the system to view websites and their content. We utilise cookies for security and analytical purposes. The use of YouTube videos on our website allows YouTube to create an advertising profile on your history. We have no control over these cookies. You are at liberty to manage these cookies through your browser, but please note that this may impact on your browsing experience.

None of the above affects your rights under the legislation, in particular your right to access the data we hold on you. You may request a copy of the personal information we may hold on you – this should be submitted in writing or email (details on the website). Please include enough information to enable us to identify you and search for appropriate data.

If you are dissatisfied with this policy, have queries about our data protection procedures or wish to lodge a complaint, please contact the organisation in the first instance. Thereafter you have the right to submit a complaint to the Supervisory Authority, the Information Commissioner's Office (ICO):

*The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF*

3) Email Privacy Notice

Email privacy notices are required to meet the Privacy and Telecommunications Regulations 2003, the GDPR (UK) and the Data Protection Act 2018. Therefore, the following text should be added to the existing footer on all outgoing emails sent by members of the club as a default, when corresponding on club business:

All personal data/special category data herein are processed in accordance with UK data protection legislation. All feasible security measures are in place. If you are not the intended recipient, please notify the sender and delete all copies. Thank you.

Personal email addresses

There is nothing in the legislation which prevents the use of personal email addresses for Lions business. The disclaimer above should still be included in the footer of emails including Lions business in the content.

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4) Forms on paper, etc

There are various forms utilised on behalf of the club – for example, that used by the Community Services Committee (CSC), and those used for the annual events, such as the Duck Derby, Swimathon and Charter meals. All such forms should have the following text added as a footer:

Any personal information herein is processed in accordance with UK data protection legislation. Further details are available from the Club.

5) Electronic forms

The Privacy Notice should be separate from any form on the website. The text below is to be added to the foot of all such forms:

Any personal information herein is processed in accordance with UK data protection legislation. All feasible security measures are in place. Further details are in our Privacy Notice.

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Subject Access Request (SAR)

Anyone can make a SAR to the club if they believe we hold data on them.

Procedures for responding to request for Subject Access

Any written request for personal information - by a club member/former member for their information or a member of the public – should be processed in accordance with data protection legislation.

Once a request for personal information is received by the club, the time limit for responding starts. This is only 28 days under the General Data Protection Regulation so it is important that the request is passed to a central co-ordinator as soon as possible. The receipt should be acknowledged. **The MD 105 Data Protection Officer should be consulted about dealing with any such request** - they are available to provide every assistance.

The club co-ordinator for the Response should consider whether there is enough information in the request to identify the subject of the data to be found? And that they are sure that the person making the request has the legal right to do so. They can ask for more information if needed.

They should search through all systems (manual or electronic) for information. Then go through all the documents to extract the personal information to be disclosed. Remember that expressions of opinion count. It is not about disclosing whole documents, but the relevant data within those documents.

Third parties – any data about someone other than the data subject is a third party. We should seek the consent of a third party to disclose their data IF it cannot be deleted from the data without destroying the data itself. In most cases this should be possible. The club is responsible for the information held so make sure that the Response includes details of where we got the information from.

The co-ordinator needs to assess what is disclosable in each case – the MD Officer can assist with this process and prevent issues later.

Response

In the Response, the co-ordinator must state that they are disclosing what is held and possible to disclose under the legislation. Anything given to the club by the Requester can be withheld, but offer to provide a copy if they wish it. Such details can be included but make sure the Requester is aware that they were the source of the data.

The Requester should be given the opportunity to request a review by the club of what's been disclosed if they think everything that should be released has not been. They also have the right to go to the Information Commissioner's Office and the Response should provide contact details for the ICO to the Requester.