



BUILT WELLS

Photographic Club

Data Protection Policy Last Updated: 18th May 2023

DATA PROTECTION POLICY

Introduction

Builth Wells Photographic Club needs to gather and use certain information about individuals.

These can include names and contact (including emergency contact) details of its members, details of suppliers such as speakers and judges. It may also include details of businesses and other people the Club has a relationship with or may need to contact.

This policy describes how this personal and sensitive data should be collected, classified & handled and then stored to meet the Club's data protection standards and to comply with the law.

Why this policy exists

This data protection policy ensures Builth Wells Photographic Club:

- Complies with data protection law and follow good practice.
- Protects the rights of the committee, members and those people and organisation who support the club.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

Data protection law

The General Data Protection Regulation (GDPR) as it applies in the UK and currently tailored by the Data Protection Act 2018 describes how organisations, including Builth Wells Photographic Club must collect, handle and store personal and sensitive information.

These rules apply regardless of whether data is stored electronically, on paper or by other means.

To comply with the law, personal and sensitive information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by seven important principles. These say that personal data must:

1. Be processed fairly, lawfully and with transparency
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date

5. Not be held for any longer than necessary
6. Have appropriate security measures in place to protect the personal data that is held.
7. Have appropriate measures and records in place to be able to demonstrate compliance and to demonstrate responsibility when handling personal and sensitive data.

People, risks and responsibilities

Policy scope

This policy applies to:

- All members of Builth Wells Photographic Club
- Builth Wells Photographic Club's meetings and events.
- The Club's administrative arrangements such as working and storing information at member's homes.
- All activities undertaken by the Club at the meeting place, other locations and where appropriate, when participating in events and competitions.
- All organisations, suppliers and other people such as speakers and judges who support Builth Wells Photographic Club.

It applies to all data that Builth Wells Photographic Club holds relating to identifiable individuals, even if that information technically falls outside of GDPR. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Emergency Contact details
- Information relating to photographic images
- Plus any other information relating to an individual that is considered personal or sensitive.

Data protection risks

This policy helps to protect Builth Wells Photographic Club from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how Builth Photographic Club uses data relating to them.
- Reputational damage. For instance, Builth Wells Photographic Club could suffer if hackers successfully gained access to sensitive data or data drives are stolen from an individual's home.

Responsibilities

All members of Builth Wells Photographic Club have a personal responsibility to ensure data is collected, stored and handled appropriately.

Everyone who handles personal (and sensitive) data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Committee is ultimately responsible for ensuring that Builth Wells Photographic Club meets its legal obligations.
- The role of the Club's Chair (or a delegated person) is to:
- Keep the committee updated about data protection responsibilities, risks and issues.
- Review all data protection procedures and related policies, prior to every AGM.
- Ensure there is an appropriate level of awareness relating to data protection matters, which are applicable to the Club.
- Handle data protection questions from members and anyone else covered by this policy.
- Deal with requests from individuals to see the data and information Builth Photographic Club holds about them (also called: Subject Access Requests).
- Check and approving any contracts or agreements with third parties that may handle the Club's personal and sensitive data.

Note: Where appropriate, the Club's Chair may delegate some or all tasks relating to data protection and the GDPR to another committee member or club member who has the skills and who is experienced to deal with the matter.

The role of the Club's Chair (or a delegated person) is to also:

- Ensure all systems, services and equipment used for storing and transferring data meet acceptable security standards
- Ensure all club owned equipment is of an adequate standard to meet current security standards.
- Evaluate any third-party services the Club is considering using to store or process data. For instance, cloud computing services and video conferencing facilities.
- Approve any data protection statements attached to communications such as emails and letters.
- Address any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other members to ensure marketing initiatives abide by data protection principles.

General club guidelines

- The only people able to access data covered by this policy should be those who need it for their specific role or task.
- Data should not be shared informally. When access to confidential information is required, Members can request it only from the Club's Chair.
- Builth Wells Photographic Club will ensure there is appropriate awareness relating to data protection matters for all members, as and when appropriate.
- All members of the Club should keep all personal and sensitive data secure, by taking sensible precautions and following the guidelines contained throughout this policy.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to people either within Builth Wells Photographic Club or externally.

- Official communication between the Club and its members via email should always be undertaken using the BCC facility to protect personal email addresses.
- Data should be regularly reviewed and updated if it is found to be out of date or contains errors. If no longer required, it should be deleted and disposed of.
- Members should request help from the Club's committee if they are unsure about any aspect of data protection.
- Similarly, members can request to opt out of all or some communication by making a request to the Chair. This could include, but not be restricted to occasional correspondence from organisations such as the Photographic Alliance of Great Britain (PAGB), the Welsh Photographic Federation (WPF).

Data storage and data handling

These rules outline how and where data should be safely stored and should be considered in the context of the Club's stance on Information Classification and Handling. i.e. Builth Wells Photographic Club has adopted two simple Classifications to manage its data and information in a meaningful and proportionate manner:

- **Unclassified** - Information that can be made available in the public domain and which would not cause damage or harm if released or shared.
- **Personal and Sensitive**: Information generally available to some, but not all committee members of Builth Wells Photographic Club and which requires protection due to the private and special nature of the information.

Note: On rare occasions and at the discretion of the Club's Chair, the Club's Personal and Sensitive information may include information whose unauthorised disclosure (even within the Club) would cause serious damage in terms of financial loss, legal action or loss of reputation of the Club or to a member.

Questions about storing information classified as Personal and Sensitive should be directed to the Club's Chair, or to the delegated person within the club.

When personal and sensitive data is stored on paper, it should be kept in a secure place where people not directly associated with the Club cannot see it and can be potentially removed or stolen.

These rules also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or secure cabinet.
- Members should make sure paper and printouts are not left where people who are not directly related to the Club could see them, such as, on a printer.
- Data printouts should be disposed of securely when no longer required. When personal and sensitive data is stored electronically, it must be protected from inappropriate access, accidental deletion and malicious hacking attempts and theft:
- Data should be protected by strong passwords that are changed regularly and never shared between members.
- If data is stored on removable media (such as a USB Memory Stick, CD or DVD), these should be kept locked away securely when not being used.

- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Data should be backed up frequently. Those backups should be tested regularly.
- All computers containing Club's data and information should be protected by adequate security software and firewall that is also kept up to date.

Data use

Personal data is of no value to Builth Wells Photographic Club unless the Club can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal and sensitive information, members should ensure the screens of their computers are locked when left unattended.
- Personal data should not be shared informally and without permission of the Club's Chair.
- Consideration should be given to encrypting data files or protecting them with a password before being transferred electronically.
- Members should not save unauthorised copies of personal and sensitive data onto their own computers.

Data accuracy

The law requires Builth Wells Photographic Club to take reasonable steps to ensure all data and information is kept accurate and up to date.

Of significant importance, greater effort should put into ensuring the accuracy of the personal and sensitive data i.e. the data that the Club has classified as "Personal and sensitive".

It is the responsibility of all members who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible:

- Data will be held in as few places as necessary. The Club's Committee should not maintain any unnecessary additional data files.
- The Club should take every opportunity to ensure data is updated. For instance, by confirming a members, judges or speakers details when they make contact.
- Builth Wells Photographic Club will make it easy for members to update the information the Club holds about them. For instance, using the Membership Form available from the Builth Wells Photographic Club Website. A review of membership details will also be undertaken annually on each subscription renewal date.
- Data should be updated as inaccuracies are discovered.

Subject Access Requests

All individuals who are the subject of personal data held by Builth Wells Photographic Club are entitled to:

- Ask what information Builth Wells Photographic Club holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how Builth Wells Photographic Club is meeting its data protection obligations.

If an individual contacts Builth Wells Photographic Club requesting this information, this is called a Subject Access Request.

Subject access requests from individuals should be made to the Club's Chair who acts as the Club's Data Controller.

The Club's Chair will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons (Consent)

In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Builth Wells Photographic Club will disclose requested data. However, the Club's Chair (or the delegated person) will ensure the request is legitimate, seeking assistance from the Committee and from external advisors such as the WPF, where necessary.

Providing information

Builth Wells Photographic Club aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, Builth Wells Photographic Club has a Privacy Notice. This sets out how data relating to individuals is used by the Club. The Privacy Notice is available to view on the Club's website.

<http://www.builthphotographic.co.uk>

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