

Data protection policy

1 About this Policy

- 1 This policy is intended to ensure that:
 - a) Branch members and other individuals interacting with the Branch have a clear understanding of how the Branch may collect and use their personal information.
 - b) All Branch officers are aware of their responsibilities with respect to collection, storage and usage of personal data.
 - c) The Branch has good governance processes in place to monitor its compliance with GDPR.
- 2 The policy explains when and why we collect personal information about our members, how we use it and how we keep it secure, and your rights in relation to it.
- 3 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (ico.gov.uk/).

2 Who are we?

- 1 We are Sonning Deanery Branch of the Oxford Diocesan Guild of Church Bell Ringers. We can be contacted via the Secretary at: secretary@sdb.odg.org.uk. Other contact details are on our website at: odg.org.uk/sdb/officers/.
- 2 Our parent body is the Oxford Diocesan Guild of Church Bell Ringers, which can be contacted via the Secretary at: secretary@odg.org.uk.
- 3 By being a member of the Branch you are automatically a member of the Guild.

3 What information we collect and why

- 1 We hold information about you to manage your membership (in conjunction with the Guild)
- 2 We hold your contact details to help us provide you with services and information.
- 3 We also hold contact details for some non-members who support Branch activities.
- 4 If you are under 18 we hold additional information to help us comply with appropriate requirements to safeguard your interests.
- 5 We routinely record the names of people present at Branch events
- 6 We may acquire additional information, including photographs, about your participation in Branch activities such as meetings, competitions, outings or training courses for use in reports, newsletters or on the website.
- 7 We do not hold Special Category Personal Data about members.

The data status table shows specific information that we may hold and use. *** *separate document* ***

4 How we protect your personal data

- 1 We have implemented generally accepted standards of technology and operational security in order to protect your personal data.
- 2 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

3 We protect your contact details in several ways:

- a) Phone numbers given on the Branch website (tower correspondents and officers) are not accompanied by postal addresses (so the information cannot be used to target your home.)
- b) Private e-mail addresses are not published on the Branch website (so they cannot be harvested). Published addresses are generic (eg secretary@sdb.odg.org.uk, twyford@sdb.odg.org.uk) not private addresses.
- c) Tower correspondents addresses supplied to the Guild are also generic¹.
- d) The members mailing list hides recipients' addresses from both the sender and other recipients. Personal addresses are only accessible to the list administrators.
- e) The Guild report (which includes address and telephone number of the Branch Secretary and tower correspondents) is only available in paper form, distributed mainly to Guild towers, officers and some members. It can also be bought by other ringers.

4 Officers who hold your personal information (on paper or digitally) do so using normal domestic levels of security.

5 Who else has access to the information you provide us?

- 1 We will never sell your personal data.
- 2 We will share some of your personal data with our parent body, the Oxford Diocesan Guild.
- 3 We may disclose personal data to third party service providers where it is essential for them to provide the service, for example a printer may see photographs or personal details mentioned in a newsletter or report.
- 4 We will not share your personal data with other third parties without your prior consent (which you may withhold) unless we are required to do so by law

6 How long do we keep your information?

- 1 We will hold your personal data on our systems for as long as you are a member of the Branch and for as long afterwards as it is in the Branch and Guild's legitimate interest, or for as long as is necessary to comply with any legal obligations.
- 2 Every year we will review your personal data and whether we need to retain it, based on the annual return from your tower correspondent. We encourage you to use this opportunity to check that the contact details we hold for you are correct.
- 3 If you cease to be a member, we will only retain those parts of your personal information that form part of the Branch/Guild's historic record.

7 How we manage compliance with this policy

- 1 One of the Branch officers is responsible for data protection compliance, ie:
 - a) To ensure Branch officers are aware of, and encouraged to observe, good practices as in this Policy,
 - b) To be informed of any suspected data breaches within the Branch, and
 - c) To be the first point of contact for any statutory or subject access requests.
- 2 Officer responsible for compliance will be designated at the AGM and named on the website.
- 3 He/she will not be the Secretary, Treasurer or Postmaster, who all handle **significant** personal data.

¹ Historically it used personal addresses, but that will change with the 2018 report.

8 Your rights explained

1 It is important that you understand your rights in respect of the Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined below please contact the officer responsible for data protection at: data@sdb.odg.org.uk. *** not yet created ***

- a) *The right to be informed (knowing how we will use your data)*. – You have the right to be told how we will use your Personal Data, which is set out in This Notice.
- b) *The right of access (being provided with copies of your data)*. – You have the right to ask us to provide you with a copy of your Personal Data that we hold. We will supply any information you ask for as soon as reasonably possible (once we are satisfied that the request really comes from you). This is called a data subject access request.
- c) *The right to rectification (changing incorrect information we hold)*. – If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. In any case, we do not want to hold incorrect information and so encourage you to inform us if it changes.
- d) *The right to be forgotten (erasure) (requesting deletion of your Personal Data)*. – In some cases (but not all) you have the right to be forgotten (i.e. to have your Personal Data deleted from our records).
- e) *The right to restrict processing (limiting how we use your data)*. – In certain situations (but not all) you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.
- f) *The right to data portability (moving your data in a useable format)*. – In certain situations you have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party.
- g) *The right to object (when we must stop processing your data)*. – You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or if the processing is for the establishment, exercise or defence of legal claims.
- h) *The right not to be subject to automated decision making including profiling (making a decision solely by automated means without any human involvement)* – This does not affect you because we do not use any automated decision making or profiling.

2 You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns/> 0303 123 1113. Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

3 For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulation.

If you have any queries, questions or comments about this policy, please contact us (as above).

9 Approval and Future Update of this Policy

This policy was approved at the AGM on 16 February 2019

Future updates (for example to accommodate future regulatory changes) will be agreed by the officers with amendments presented at a subsequent AGM for approval.