



## Crewe Dinner

# General Data Protection Regulation Policy

| Version | Date         | Updated        | Reviewed | Comment                  |
|---------|--------------|----------------|----------|--------------------------|
| A       | March 2023   | Richard Barr   |          | Created new policy       |
| B       | October 2023 | Russell Birnie |          | Updated Various Sections |
|         |              |                |          |                          |
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1.0

## 1.0 Statement of General Policy

Our data protection policy adheres to current UK legislation with respect to data protection. This is a default position given our residence as an organisation within the UK. It is the Crewe Dinner Committee's responsibility to make sure we comply with the General Data Protection Regulation (GDPR), and that this is maintained.

The legislation establishes a framework of rights and duties which are designed to safeguard personal data. This framework balances the legitimate needs of organisations to collect and use personal data for business and other purposes against the right of individuals to respect for the privacy of their personal details.

The legislation states that if you process personal data, then you must comply with the regulations and, in particular, you must handle the personal data in accordance with the data protection principles. Broadly, however, if you collect or hold information about an identifiable living individual, or if you use, disclose, retain or destroy that information, you are likely to be processing personal data. The scope of the legislation therefore is very wide as it applies to just about everything you might do with individuals' personal details.

### 1.1 Data Protection Policy

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#### **Data**

Personal data is captured and processed by The Crewe Dinner in numerous ways, therefore we have put procedures in place to deal with GDPR and to take account of individuals' rights in a transparent way by adhering to the policies and procedures set out below.

#### **Types of data stored:**

##### **Members data**

The Crewe Dinner keep records about members including personal contact details.

##### **Donor (Sponsor) / Beneficiary and Supplier data**

We also keep names and addresses of any donors (should there be any) and beneficiaries – specifically for the raffle proceeds, as well as our suppliers

We have lawful grounds for processing personal data to comply with GDPR requirements and will handle all information collected in an accountable way.

##### **Shared Data**

A table of data stored and shared by The Crewe Dinner is in Section 1.8. this lists all data stored, by whom and how it is stored.

##### **Consent**

As a membership organisation, we need to be able to contact all members on a regular basis therefore all members are asked to provide contact details.

The key elements of consent set out in the GDPR definition are that it must be freely given, specific, informed, and there must be an indication signifying agreement. This must be unambiguous and involve clear affirmative action. Individuals are to have clear choices about consent and ongoing control over their consent.

GDPR states that consent must be explicit, so for this reason –

1. All members will be asked annually whether they still wish to be informed and contacted regarding The Crewe Dinner activities (usually done by the Secretary by email).
2. Positive confirmation of not wishing to be contacted will result in removal and deletion of data collected, with no further contact.

## **1.2 Policy: Managing Member Data**

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- Members data is held within the designated officer's homes – either physically or electronically.
- Members have the right to view or to ask for data not to be used at any point, this includes photographs and videos.
- If we maintain member data, or access it, for the purposes of supporting The Crewe Dinner activities, all such data should only be accessed for that purpose and should never be divulged to any third party, without prior agreement with the member.
- We review the need to retain member data regularly, making sure that information stored is up-to date.
- We may store membership data including photographs and videos in perpetuity for archive purposes.

## **1.3 Policy: Managing Sponsors / Donors Data**

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- Sponsors data is held within the designated officer's homes – either physically or electronically.
- Sponsors have the right to view or to ask for data not to be used at any point, this includes photographs and videos.
- If we maintain sponsors data, or access it, for the purposes of supporting The Crewe Dinner activities, all such data should only be accessed for that purpose and should never be divulged to any third party, without prior agreement with the sponsor.
- We review the need to retain sponsor data regularly, making sure that information stored is up-to date.
- We may store sponsorship data including photographs and videos in perpetuity for archive purposes.

## **1.4 Policy: Managing Supplier Data**

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- Supplier data is held within the designated officer's homes – either physically or electronically.
- Suppliers have the right to view or to ask for data not to be used at any point, this includes photographs and videos.
- If we maintain supplier data, or access it, for the purposes of supporting The Crewe Dinner activities, all such data should only be accessed for that purpose and should never be divulged to any third party, without prior agreement with the supplier.
- We review the need to retain supplier data regularly, making sure that information stored is up-to date.

- We may store supplier data including photographs and videos in perpetuity for archive purposes.

## **1.5 Policy Managing Beneficiary Data**

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- Beneficiary data is held within the designated officer's homes – either physically or electronically.
- Beneficiaries have the right to view or to ask for data not to be used at any point, this includes photographs and videos.
- If we maintain beneficiary data, or access it, for the purposes of supporting The Crewe Dinner activities, all such data should only be accessed for that purpose and should never be divulged to any third party, without prior agreement with the beneficiary.
- We review the need to retain beneficiary data regularly, making sure that information stored is up-to date.
- We may store beneficiary data including photographs and videos in perpetuity for archive purposes.

## **1.6 Policy: Managing The Crewe Dinner Data**

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1. Personal data shall be processed fairly and lawfully and, in particular:
  - a) have legitimate grounds for collecting and using the personal data;
  - b) do not use the data in ways that have unjustified adverse effects on the individuals concerned;
  - c) handle people's personal data only in ways they would reasonably expect; and
  - d) make sure we do not do anything unlawful with the data.
2. Personal data shall be obtained only for specified and lawful purposes, and shall not be further processed in any manner incompatible with those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. In order to maintain the security of members information including photographs and videos, all paper records, files and documents and electronic data, will be kept safely.

## **1.7 Retention Policy & Privacy Statement**

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Records are kept indefinitely unless during review the data is deemed not required, or a specific request has been received to cease holding that data.

The Crewe Dinner believes privacy is a fundamental human right, therefore we have minimised the collection and use of personal data whenever possible and provide transparency and control over any information held.

## 1.8 Table Of Data Held

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| Data Held                                                                 | Mandatory Data | Who Holds the Data                                 | How Is The Data Held         |
|---------------------------------------------------------------------------|----------------|----------------------------------------------------|------------------------------|
| Members Name                                                              | Yes            | Secretary, Treasurer                               | Paper Files & Electronically |
| Members email                                                             | Yes            | Secretary, Treasurer                               | Paper Files & Electronically |
| Members Address                                                           | No             | Secretary, Treasurer                               | Paper Files & Electronically |
| Members Phone Number                                                      | No             | Secretary, Treasurer                               | Paper Files & Electronically |
| Sponsor Details including Name, email , address, and phone number         | Yes            | Secretary, Treasurer, designated Committee Members | Paper Files & Electronically |
| Supplier Information including Name, email , address, and phone number    |                | Secretary, Treasurer                               | Paper Files & Electronically |
| Beneficiary Information including Name, email , address, and phone number |                | Treasurer                                          | Paper Files & Electronically |