

## Western Power Electricity Historical Society

### Data Protection Policy

#### 1. Introduction

The General Data Processing Regulation comes into force in 2018.

This Policy defines how WPEHS will comply with the GDPR, and in particular what data is retained and processed by WPEHS, and for what purposes.

#### 2. Data held

WPEHS holds three types of data:

- Membership data
- Event and activity data
- Enquiry data

All of these involve **personal data**, but none of them involve **special categories of personal data** in the terms of the GDPR.

The **lawful basis** for all this information being held and processed is **legitimate interests**, i.e. to carry out Society activities, WPEHS “**use people’s data in ways they would reasonably expect and which have a minimal privacy impact**”. The following subsections explain why the three types of information are required. WPEHS does not retain or process information that would require explicit **consent** under the GDPR.

##### (a) Membership data

The membership information is supplied by the member when they join or update their membership. It comprises:

- Name of member (and partner if they participate in WPEHS activities)
- Address, email and telephone number
- Notes – special interests, relevant employment history
- Dates of membership renewals and method (BACS or other)

Legitimate interests:

This information is required to communicate with members about WPEHS activities, to track and update membership status, and to tailor WPEHS services to members’ preferences.

How the information is held and processed:

The information is held in a master spreadsheet controlled, maintained and updated by the Membership Secretary. Extracts are used to generate mailing information (mailing labels and email lists) for event information, the WPEHS magazine and other information of relevance to the membership. The Treasurer will also receive payment information when

BACS payments appear on the bank statements. This information is passed on to the Membership Secretary to update the master spreadsheet.

(b) Event and activity data

Events and activities are delegated to committee members to organise. They will use the information in the membership spreadsheet to communicate with members who have signed up for events or activities, plus additional information supplied by the member as required for a particular event or activity, such as names of guests, meal and accommodation choices, and the status of the member's payment for the event/activity.

Legitimate interests:

This information is required so that the organisers can enable the members and their guests to participate in events and activities.

How the information is held and processed:

The information is held by the organising committee members on a "need to know" basis. Occasionally some information may need to be shared with outside bodies – for example a venue may need to know the names of people attending. The event/activity specific information is not reused for any other purpose.

(c) Enquiry data

Enquiries about WPEHS activities and archives are received from enquirers by individual committee members by post, phone, email or web form. They may be passed to other committee members or nominated volunteers who are best placed to answer the enquiry.

Legitimate interests:

The information is held to enable the enquiry to be answered.

How the information is held and processed:

The information is held by the individual committee member or nominated volunteer, and only passed to others on a "need to know" basis. The enquiry specific information is not reused for any other purpose. It is not held in any form of structured database.

### **3. Data retention**

The only formal register of membership information shall be held by the Membership Secretary in a password protected environment. Such records will be retained for a maximum period of four years.

If other members require the information for legitimate purposes e.g. to manage an event on behalf WPEHS it will be provided by the Membership Secretary to the individual by email with a password protected file. The password will be given to the recipient by a separate communication.

When the email is received, the recipient must save the information to a password protected environment and delete the email and the attachment.

Once the reason for having the data has expired it must be deleted – it must not be retained for any purposes.

**4. How the information held is communicated to members**

Members are made aware of the types of information that WPEHS hold through a privacy notice on the website, in the magazine and in membership communications.

**5. Subject access requests - reviewing, updating and deleting information**

Members are asked to contact the Membership Secretary if they wish to review, update or delete their membership information, or to contact the responsible committee member direct regarding events, activities or enquiries information. On receipt of a member’s request the Membership Secretary or other relevant committee member will provide a copy of the relevant data electronically and in a commonly used format.

**6. Data protection responsibility**

Data protection responsibility rests with the Membership Secretary on behalf of the committee.

It is the responsibility of the Committee members (and nominated volunteers dealing with enquiries) to ensure the security of membership, event and enquiry information they hold by maintaining up-to-date virus protection and firewall, and by ensuring the physical security of any devices they hold this information on.

If any person has reason to suspect a data breach they should notify the Membership Secretary or the Chairman, who will arrange for investigation and appropriate action.

Adopted: ..... (date)

Signed: .....

Role: .....

Note: This document is based on “GDPR: 12 steps to take now” and other guidance from the Information Commissioner’s Office online document “Guide to the General Data Protection Regulation (GDPR)” available from:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>