

Data Protection Policy 2019

Introduction

The Leicester Sketch Club holds personal information about individuals in order to deliver its objectives and meet the needs of members. The information we gather and hold is limited to what the Club needs to function, it is not shared with third parties and is not retained for longer than necessary. Our processes are designed to protect personal information about Club members. This policy has been drafted in accordance with the General Data Protection Regulation (GDPR) which is the EU law that is effective from 25 May 2018. The GDPR applies to both digital and hard copy data. Decisions about what personal information is held and procedures for holding that information in a secure way, are made by the LSC Committee of Management.

The lawful basis upon which the Leicester Sketch Club operates this policy is that each member gives clear consent on the membership renewal form to process their personal data for the Club's specific purpose. The LSC only collects data for recreational reasons and is exempt from registering with the Information Commissioner's Office (ICO) but operates within the guidance issued by the ICO.

Guiding principles

Personal information about individuals should be

- processed with regard to lawfulness, fairness and transparency: individuals must be able to easily understand how and why we are processing their data
- accurate and updated regularly and any inaccuracies should be corrected or deleted without delay
- collected for legitimate purpose of the LSC and used only for the purpose for which it is collected
- limited to the minimum amount of data we need in order to achieve our purpose
- held securely and not retained for longer than necessary
- processed securely so as to avoid unauthorised or unlawful processing, accidental loss, destruction or damage

Personal Data held by The Leicester Sketch Club

The personal information held by LSC for each member, (including Associate and Student) is name, address, email, and telephone, contact preference and type of membership.

The personal information held by LSC for purpose of sending the monthly Newsletter is name and e-mail.

The personal information held by LSC about past members is their name and year(s) of membership, plus any office held.

What is the information used for?

We keep this information so that members can be written to and membership fees can be collected and members and friends can be kept up to date about Club activities. Membership information is held by the membership Secretary, Treasurer and Club Secretary. E-mail contact information is stored on a secure cloud based system called Mailchimp. Membership names and contact information are recorded on secure, password protected spreadsheets. Personal details are only used by the Club and are not used for other purposes or shared with other organisations.

How long is it retained?

The Leicester Sketch Club will retain limited personal information (names) after membership has ceased, only in pursuit of its legitimate interests. When a Club member does not renew their membership their contact details are deleted from the webmail mail box. Details are retained on the Newsletter mail box until there is an instruction to unsubscribe by clicking at the end of the Newsletter.

Responsibility, access and process for updating

Contact information about members is held by the Membership Secretary and Secretary (Alison Cork). The names of members may be accessed by members of the Committee of Management. Names are stored on a password protected server. The Membership Secretary is responsible for keeping records up to date, and advising other Committee members of changes to the e-mail address book and newsletter mailing list, including removal of information, on an annual basis, where membership is not renewed.

Use of images of work

A core activity of the Sketch Club is to enjoy sharing images of members' work, including posting images on social media. Whilst it is hoped that all members are comfortable with this, the Club does not make assumptions about members' preferences. So members are asked to give consent to images of their work, or of themselves being engaged in LSC activities, being used to promote the Club. Consent is given by agreeing to Sketch Club Exhibition terms and conditions, and on an annual basis when membership is renewed. Members have the right to change their minds at any reasonable time and should inform the Secretary.

Members' Rights

Members of the LSC have various rights regarding their personal data under the provision of the GDPR.

- The right to be informed: the right to know what LSC is doing with their personal data and why
- The right of access: the right to see exactly what information LSC has on an individual
- The right to rectification: the right to tell us to correct personal data promptly
- The right to erasure: the right to ask us to erase any and all data that we hold on an individual
- The right to restrict processing: the right to tell us not to perform a particular process on personal data
- The right to data portability: the right to have their data provided in a machine-readable format that other organisations can easily access, e.g. a CSV file
- The right to object: the right to object to processing even where we have a legitimate lawful basis, based on the individual's specific situation
- Rights in relation to automated decision making and profiling: rights around where you can or cannot use automated systems to process data.

Members have the right to access their personal data so that they can verify that their data is being processed properly. The LSC will provide a copy of personal data (name, address, e-mail, and telephone and contact preference) free of change within one month of a verified request.

Data breaches

In the event of personal data held by LSC being accidentally lost or destroyed, corrupted or disclosed, or if someone accesses data or passes it on without proper authorisation, or if data is made unavailable, for example, when it has been encrypted by ransomware, the Committee will take steps to address the security breach. In the event of a risk to people's rights and freedoms the Committee will notify the ICO.

Making a complaint

If you are not satisfied that The Leicester Sketch Club is handling your personal data in a legitimate way, please contact the Secretary (Alison Cork). The Chairperson and Committee are ultimately responsible for ensuring that the LSC meets its legal obligations around data protection. We will aim to resolve any problems, but you also have a right to complain to the Information Commissioner's Office (ico.org.uk) if you think there is a problem with the way we are handling your data. The Information Commissioner can be contacted on:

Post: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK95AF. Tel: 0303 123 1113. Email contact can be made by accessing www.ico.org.uk

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email: <u>enquiries@leicestersketchclub.co.uk</u> or by post: 47 Belvoir Drive LEICESTER LE2 8PB

This policy was adopted by the Committee of Management on: 4th June 2019

Signed by the Secretary on behalf of the Committee:

The policy will be reviewed on an annual basis by the Committee: Renewal date: May 2020

Appendix: the membership form and renewal form