

GDPR and Friends of St Mary's Winkfield

1 GDPR (General Data Protection Regulation)

1.1 Introduction

All organisations that hold any personal data about people need to comply with The General Data Protection Regulation (GDPR) as from 25 May 2018; and although the Friends of St Mary's Winkfield (FOSMW) holds a very limited amount of information about people, because we do, we must implement the regulations.

1.2 What is GDPR?

The General Data Protection Regulation (GDPR) is a new, Europe-wide law that replaces the Data Protection Act 1998 in the UK. It is part of the wider package of reform to the data protection landscape that includes the Data Protection Bill. The GDPR sets out requirements for how organisations will need to handle personal data after 25 May 2018.

1.3 What information does the GDPR apply to?

The GDPR applies to 'personal data', which means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (including people's names).

2 What information does FOSMW hold, and how?

GDPR sets requirements on information:

- Lawful, fair and transparent processing of information
- Collection of data for legitimate purposes
- Maintenance of accuracy
- Storage in a form permitting deletion or being made anonymous when no longer needed for current use
- Maintenance of security

FOSMW currently collects information voluntarily in the course of its normal business, and maintains it in line with these requirements:

- Information about members that is based on the information supplied on the membership application form when they became members (e.g. name, address, telephone number, email address, method of payment)
- Gift Aid declarations

- Records of financial transactions with members, donors, purchasers of tickets for events, pipe sponsors, as part of the FOSMW financial accounting
- Information relevant to people, including children, who contribute to events. For example, we maintain contact details of parents of children who sing in the Junior Concert Choir of our Christmas concerts, and we store contact details of purchasers of tickets for events, or of donors, when they use card-payment organisations such as PayPal or CAFDonate.
- Information about potential supporters (persons and organisations) of events and other fundraising activities where this supports the registered Objects of FOSMW.

This information is stored in:

- Accounts information – in an accounting package or ‘app’ database;
- General lists – Excel files;
- Text material such as Gift Aid declarations, formal acknowledgements of donations – in folders of Word and PDF files;
- Emails – in a distinct email folder within an email database;

Officers of FOSMW may also hold items of contact information for members, to maintain their proper relationships with them. However, they will discard this information upon request, and will not create local databases of such information.

Some kinds of information are designated as ‘sensitive’ (this would include medical information or information that could be used to harm an individual). FOSMW holds no such information.

FOSMW does not store bank account information for individuals, other than in respect of standing orders or drafts made through ourselves. Sort-code and account number on cheques that we process are not retained. Any information that we do keep is accessible to the Treasurer and is not otherwise promulgated.

3 Consent

GDPR sets standards on the maintenance of consent for the providing and use of personal information:

- Requirement of positive ‘opt-in’ (e.g. no pre-ticked tick-boxes);
- Clarity in what is consented to;
- Ease of withdrawing consent;
- Maintenance of evidence of consent;
- Avoidance of over-reliance on consent;

We will move our application forms etc. towards full respect of consent. However, we do not anticipate that we have much information affected significantly by consent issues.

See also: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/>

4 What do we do with the information?

No personal information is provided to any other body, for any purpose, other than what is suitable for public distribution and is normally distributed in this way (e.g. lists of singers in concert handouts). Opting out from such public lists is respected.

Information is primarily held so that we can administer membership, donations and participations (past, present and future) in FOSMW activities and campaigns.

All information is held on a single computer system in the Treasurer's office. This information is continually backed up, and a copy is periodically maintained as a mirror image in a separate file-system.

The computer system is protected by Norton 360 fire-walls, and is believed to be secure. Due precautions are taken against virus infection, including an enhanced Norton service that is available on request to detect threats.

5 What are the entitlements of information owners?

The GDPR provides the following rights for individuals:

- The right to be informed. Members and donors and participants in activities will automatically be included, but we will respond to queries as to whether FOSMW holds information.
- The right of access. We can advise individuals (subject to identity verification when necessary) what information we hold on them.
- The right to rectification. We will correct information on request, but we request that members, donors and participants advise us on change of contact-details (e.g. address, email).
- The right to erasure. We will remove information when requested. However, we will be unable to communicate with members if their details are deleted.
- The right to restrict processing. We not process data; we use it only in its recorded state.
- The right to data portability. This relates to users porting their data from one service (e.g. banking) to another. FOSMW does not hold information for which this would be valuable.

- The right to object. This relates to the processing of data (e.g. for profiling.) FOSMW does not process personal data.
- Rights in relation to automated decision making and profiling. FOSMW does not do this.

6 How is GDPR in FOSMW accessed and controlled

All GDPR matters are handled in FOSMW by the Data Protection Officer, who is Anthony Hodson, 01344 483347 ah@xdotd.com or info@fosmw.com

FOSMW is a Data Controller and a Data Processor, in GDPR terms, and all use of information is within the single organisation.

7 What now?

The Friends believe that they are doing all that is necessary to comply with the spirit and the letter of GDPR. However, GDPR is a new law that will take a lot of settling in, and we may well find that we need to do more.

The important thing to remember is that GDPR is there to protect ordinary people from deliberate (and inadvertent) misuse of their information, so we need to be sensitive to concerns that people have about respect for their information.

Please be in touch with us if you need more specific information about what information we hold, and what we do with it. We would prefer that you do your own research on what GDPR is! FAQs may be found at:

<https://ico.org.uk/for-organisations/charity/charities-faqs/>

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