

The George Community Pub (Wickham Market) Limited

A Community Benefit Society



THE GEORGE
Community Pub

Data Protection Policy

This document has been prepared by Richard Fordham the Society's Data Protection Officer and approved by the Management Committee on 28th August 2018.

Introduction

In order to operate, the Society's Management Committee (MC) needs to gather, store and use certain forms of information about individuals.

These can include Society Members, volunteers*, "friends" of The George, contractors, suppliers, business contacts and other people the MC has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet MC data protection standards and comply with the General Data Protection Regulations (GDPR).

* for the purposes of this policy, Volunteers are the members of MC and its sub-committees.

Data Protection Principles

We fairly and lawfully process personal data in a transparent way.

MC will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

There are two categories; "Friends of The George" and Members of the Society. For Friends we collect contact information, name and an email address. For Members we collect; name and address, email address, the numbers of shares applied for and the amount (£) invested, bank details and signatures. Members data will be held in accordance with the provisions of the Co-operative and Community Benefit Societies Act 2014. Where possible MC will anonymise the data.

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to MC completing tasks expected as part of the individual's membership).
- The name and contact details of volunteers*, committee members, members and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their membership and role.
- Further information, including personal financial information will also be collected in order to process the future payment of any interest or purchase of shares.
- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to MC completing tasks expected as part of working with and informing individuals),
- Lawful basis for processing online data: Consent (see 'How we get consent')
Pseudonymous or anonymous data (including behavioural, technological and

geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the MC website' below

- Lawful basis for processing this data: Consent (see 'How we get consent')

We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

When collecting data, MC will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

We ensure any data collected is relevant and not excessive

MC will not collect or store more data than the minimum information required for its intended purpose. E.g. we need to collect telephone numbers from members in order to be able to contact them about group administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of group administration.

We ensure data is accurate and up-to-date

MC will ask Members to check and update their data on an annual basis. Data from all other parties will be reviewed every two years. Any individual will be able to update their data at any point by contacting the Data Protection Manager.

We ensure data is not kept longer than necessary

MC will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).

The storage and intended use of data will be reviewed in line with MC's data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

We keep personal data secure

MC will ensure that data held by us is kept secure.

Electronically-held data will be held within a password-protected and secure environment.

Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.

Physically-held data (e.g. members application forms or email sign-up sheets) will be stored in a strong box.

Keys for locks securing physical data files should be collected by the Data Protection Manager from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position.

Access to data will only be given to relevant management committee members where it is clearly necessary for the running of the group. The Data Protection Manager will decide in what situations this is applicable and will keep a master list of who has access to data.

Transfer to countries outside the EEA

MC will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

Individual Rights

When MC collects, holds and uses an individual's personal data that individual has the following rights over that data. MC will ensure its data processes comply with those rights

and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

Individual's rights

Right to be informed: whenever MC collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.

Right of access: individuals can request to see the data MC holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Manager and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.

Right to rectification: individuals can request that their data be updated where it is inaccurate or incomplete. MC will request that members, staff and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.

Right to object: individuals can object to their data being used for a particular purpose. MC will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.

Right to erasure: individuals can request for all data held on them to be deleted. MC data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:

- There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
- There is a legal requirement to keep the data.

Right to restrict processing: individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, MC will restrict the data while it is verified).

Though unlikely to apply to the data processed by MC, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

How we get consent

MC will regularly collect data from consenting supporters for marketing purposes. This includes contacting them to promote events, updating them about progress with the restoration project, meetings, fundraising and other group activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like MC to send you email news updates with details about forthcoming events, meetings fundraising activities and opportunities to get involved')
- Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).
- Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

Cookies on the Society's Website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

MC uses cookies on the Society's website www.wmgeorge.co.uk and in order to monitor and record their activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may however prevent you from taking full advantage of the website.

The MC website will also include a link to our Privacy Policy