

Gordon-Keeble Owners' Club

Data Protection Policy

General Statement of GKOC's Duties and Scope

GKOC is required to process relevant Personal Data relating to members and other individual contacts in accordance with this policy and the General Data Protection Act 2016 (GDPR).

Data Protection Officer (DPO)

GKOC have appointed the Membership Secretary as the Data Protection Officer who will ensure all personal data is processed and reviewed in accordance with this policy and maintain compliance with the GDPR.

Data Controller (DC)

GKOC have appointed the Membership Secretary as the Data Controller to determine the purposes and means of processing personal data.

The Principles

GKOC shall so far as is required comply with the GDPR to ensure all data is: -

- Fairly and lawfully obtained
- Processed for a lawful purpose
- In accordance with the legitimate interests of the Data Controller
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the subject's rights
- Secure

Definitions

Gordon-Keeble Owners' Club (GKOC) is the club as set out in the Club's Constitution as published on the club's website.

Data Subject is an individual who is the subject of Personal Data.
Personal Data means any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier.

Sensitive Personal Data includes data relating to a subject's medical information, gender, religion, race, sexual orientation, trade union membership, criminal records and proceedings.

Processing of Personal Data

GKOC may from time to time require to process members data for the purposes of maintain membership lists, despatching mail, compiling event lists and informing members of events. Such processing will be in accordance with the specific agreement contained in the membership application form or in accordance with the legitimate interests of the Data Controller.

For any other purposes specific agreement will be obtained from members for disclosure of their Personal Data.

Sensitive Personal Data

GKOC will only disclose Sensitive Personal Data where it is required to do so by legal obligation or it is necessary to perform a task in the public interest.

Right of Access to Information

Data subjects have right of access to data held by GKOC subject to the provisions of the GDPR. Any Subject Access Request (SAR) will be dealt with by the Data Protection Officer and responded to within one month of receipt. It is the responsibility of any Committee member receiving an SAR to pass this immediately to the DPO.

Accuracy

GKOC will endeavour to ensure all personal data held is accurate. It is the responsibility of members to notify the Data Controller of any changes to information held. Members have the right to request inaccurate information is corrected or erased.

Data Retention

Members' data will only be retained in accordance with the principals of the GDPR. The following criteria will be applied by GKOC: -

| | |
|---------------------------|--|
| Membership details | 3 years after expiry of membership. |
| Committee Meeting Minutes | 3 years from date of meeting. |
| Events Lists | 3 years after the event. |
| Other personal data | In accordance with the provisions of the GDPR. |

Data Security

It is the responsibility of all Committee members to be aware of the GKOC Data Protection Policy and Privacy Policy and to ensure compliance in respect of any data held or processed.

GKOC will take all technical and organisational steps to protect personal data.

All personal data held or processed shall be encrypted and/or password protected.

All encryption keys/passwords to be communicated by separate means to the file they apply to.

All personal data shall only be held on equipment protected by an up to date Firewall.

All data will be erased or destroyed in a secure manner and in accordance with good practice.

Data Breaches

Any breach of personal data or this data policy must be immediately reported to the DPO.

In the event of a GDPR reportable breach it is the responsibility of the DPO to advise the Information Commissioners Office within 72hrs in accordance with the provisions of the GDPR.