

# Sidmouth Photographic Club

## Data Privacy Policy and Working Practice

### (General Data Protection Regulations)

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Sidmouth Photographic Club (SPC) recognises the importance of data protection for any personal data collected in the running of the club. This policy sets out how SPC will collect, handle and store personal data to meet the Club's data protection standards and to comply with the General Data Protection Regulation. Areas covered include:

**Communication** How SPC informs its members about how and what SPC does with their data.

**Consent** How SPC obtains consent of its members to use the data and the purpose for which it is collected.

**Data Retention** How SPC ensures that data is not kept for longer than is necessary for the purpose for which it was collected, and for how long SPC will keep personal data.

**Data Transfer** How members will be informed when they join SPC if SPC is going to transfer their data – for example competition entries/results to other organisations such as other clubs or the WCPF.

**Subject Access Requests** How SPC will handle access requests and/or complaints by individual club members.

**Data breaches** How SPC makes sure that personal data is held securely.

In preparing this policy the following documents have been consulted:

The Photographic Alliance of Great Britain Advice for Clubs, Federations and the PAGB – Data Protection

The Information Commissioner's Office website

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## 1 Definitions

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**Activities** are meetings, events, visits, outings or anything else that is organised by Sidmouth Photographic Club

**Club Membership Form** is the membership form completed by current Members annually and by new Members when they join and which includes important information about this policy

**Committee** is the Committee of SPC comprising the Chairman, Vice Chairman, Secretary, Treasurer, Programme Secretary and Competition Secretaries who may be serving in an elected or acting capacity and others co-opted to it from time to time.

**Data** means personal information collected by SPC and covered by this policy and the GDPR

**GDPR** General Data Protection Regulation approved by the EU Parliament on 14 April 2016 with an enforcement date of 25 May 2018

**Members** are the paid or honorary members of SPC which include Officers

**Officers** are the Officers of SPC and comprise elected and/or acting Committee Members and the President

**SPC** Sidmouth Photographic Club – the Club

**Suppliers** may include visiting lecturers, judges and others

**Visitors** are individuals who attend club meetings but are not Members, or are individuals who make enquiries about the club with the intention of joining.

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## 2 About This Policy

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1. This Data Privacy Policy ensures that SPC:
  - Complies with data protection law and follows good practice
  - Protects the rights of members
  - Is open about how it stores and processes members' data
  - Protects itself from the risks of a data breach
2. SPC reserves the right to amend this Data Privacy Policy from time to time without prior notice and will inform members of the changes at the time of their implementation.
3. SPC will always comply with the General Data Protection Regulation (GDPR) when dealing with members' personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, SPC will be the "controller" of all Member personal data held by SPC.

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### 3 What SPC does with members' data

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SPC collects, uses and stores members' personal data, as described in this Data Privacy Policy and as described when the data was collected from each member.

#### 1. The data SPC collects and why

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, email address(es)	Managing the Member's membership of the Club	Performing the Club's obligations to its Member. For the purposes of SPC's legitimate interests in operating the Club, arranging activities, and promoting awareness of the Club
Emergency contact details	Contacting next of kin in the event of emergency	Protecting Member's vital interests and those of their dependants
Member's Photographic Distinctions	Recognising Member's achievements: enabling sharing of expertise within the Club; promoting photographic distinctions on the Club website	For the purposes of SPC's legitimate interests in encouraging members to apply for photographic distinctions and to promote the Club's photographic competence
Visitor Contact Details	Managing the recruitment of new members	For the purposes of SPC's legitimate interests in operating the Club
Supplier Contact details	Managing the Club activities Payment of services	For the purposes of our legitimate interests in operating the Club

#### 2. Third party access to data

SPC will never sell members' personal data. SPC will not share members' data with any third parties without member's individual prior consent (which members are free to withhold) except where required to do so by law.

#### 3. Retention of Members' data

SPC will retain individual member's data for as long as an individual is a member of the Club and for as long afterwards as it is in the Club's legitimate interest to do so. SPC will review individual member's data every year to establish whether it is still entitled to process it. If SPC decides that it is not entitled to do so, SPC will stop processing the individual member's data except that it will retain the member's data in an archived form in order to be able to comply with future obligations: for example confirmation to WCPF of member's period of membership ref PAGB distinctions.

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## 4 Member rights

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Members have rights under the GDPR:

- to access their personal data
- to be provided with information about how their personal data is processed
- to have their personal data corrected
- to have their personal data erased in certain circumstances
- to object to or restrict how their personal data is processed
- to have their personal data transferred to themselves or to another entity in certain circumstances.

Members have the right to take any complaints about how SPC process their personal data to the Information Commissioner: <https://ico.org.uk/concerns/>

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## 5 Responsibilities

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All Officers of SPC have some responsibility for ensuring data is collected, stored and handled appropriately. In addition, certain club Members involved in organising Activities will from time to time have the same responsibilities.

Each Officer and Member that handles personal data has responsibility to:

- ensure that data is handled and processed in line with this policy and data protection principles
- ensure their own systems and equipment used for storing data meet acceptable security standards
- perform periodic checks and scans to ensure their own security software is functioning properly

These people have specific areas of responsibility:

The Committee is ultimately responsible for ensuring that SPC meets its legal obligations.

The Chairman is responsible for ensuring that Officers understand and apply this policy.

The External Competition Secretary is responsible for ensuring that the Club has the consent of its Members who have entered images, for those members' data to be held by the organiser, where such data is required by the organiser.

The Secretary is responsible for:

- Keeping the Committee updated about data protection responsibilities, risks and issues..
- Arranging data protection advice for the people covered by this policy.
- Handling data protection questions from members and anyone else covered by this policy.
- Dealing with requests from individuals to see the data that SPC holds about them (also called 'subject access requests').
- Managing Next of Kin data.

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## 6 Subject Access Request

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Individuals who are the subject of personal data held by SPC are entitled to:

- Ask what information SPC holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how SPC is meeting its data protection obligations.

If an individual contacts a Committee Member requesting this information, this is called a *Subject Access Request*.

Subject Access Requests from individuals should, in the first place, be made by email, addressed to the Secretary. The Secretary will then aim to provide the relevant data within 14 days.

The Secretary will always verify the identity of anyone making a *Subject Access Request* before handing over any information.

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## 7 Providing Information

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SPC aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

The Club's privacy statement, which sets out how it meets these aims, is printed on the Club Membership Form.

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## 8 Consent

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SPC will obtain any necessary consent of its members to use the data and will describe the purpose for which it is collected by means of the Club Membership Form.

'Circular' emails shall only be distributed to those members who have indicated that they wish to opt in to receive such communications from the Club.

Members may revise their choice to opt in or out of receiving 'circular' emails at any time.

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## 9 Compliance

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From time to time, and at least once per year, the club shall review its compliance with this policy and shall document the findings. Any remedial actions required, shall be implemented.

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## 10 Working Practice

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### 1. Guidelines

The only people able to access data covered by this policy should be those needing it to perform their Club role.

Committee Members and other Members having possession of personal data for the purpose of organising Activities should keep all data secure, by taking sensible precautions and following the guidelines below.

- data should not be disclosed to unauthorised people, either within SPC or externally.
- data should be regularly reviewed and updated if necessary. If no longer required, it should be deleted and disposed of.
- data of past Members, and visitors should be deleted from membership lists held by individual Committee Members and disposed within one year of that member leaving the club.
- past Members' data will be retained by the Secretary in archive form only available for consultation by Officers of the club through application to the Secretary
- Financial records normally will be kept for period of six years

### 2. Data Storage

These rules describe how and where data should be safely stored.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

Data that is usually stored electronically but has been printed out for some reason:

- Must not be left where unauthorised people could see it.
- Should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.

If data is stored on removable media (eg memory sticks) these should be kept securely when not being used.

Data should not be saved to mobile devices like tablets or smart phones, with the exception of email addresses and phone numbers intended to be used on those devices.

All computers containing data should be protected by security software and by a firewall.

### 3. Interclub Competitions

Where the organiser of an interclub event requires details of the photographer beyond their name, then it is necessary to obtain explicit consent of each Member for that information to be provided to the organiser.

### 4. Communications

When sending distribution emails to the club membership the sender should avoid exposing the emails of all recipients on the circulation list by using the "bcc method" of email distribution.

'Circular' emails shall only be distributed to those members who have indicated that they wish to opt in to receive such communications from the Club.

### 5. Segregation of Data

Data acquired by SPC for the legitimate use of the Club must not, under any circumstances, be used for the purposes of another organisation. This situation where an SPC Committee Member is involved in more than one photographic club could give rise to this situation. In this case there must be a separation between the data from each organisation.

Similarly, there must be a separation between controlled and domestic use of data.

### 6. Electronic Marketing

Any email requests received by the Club to pass on marketing information for goods or services to Members must be rejected. However, photographic equipment offered for sale by members will be allowed on an occasional basis.

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