### Data protection principles

STRADFAS is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR).

**This policy shall be reviewed annually at the Committee meeting before the AGM.**

STRADFAS is an exempted body and do not have to register with the Information Commissioner’s Office.

STRADFAS collects member’s data for the purposes of running STRADFAS, including:

* Notifying members of renewal fees and STRADFAS’s future programme of events;
* Collecting membership fees;
* Sending emails of STRADFAS’s events.

The information collected is limited to the minimum needed to administer STRADFAS.

STRADFAS does not use bought-in database information.

For the purposes of complying with the GDPR the ‘Data Controller’ is the STRADFAS Committee, which determines the data to be collected and how this is to be done. The ‘Data Processor’ and the ‘Responsible Person’ is the Membership Secretary.

**Information collected** includes (but may not be limited to):

1. **Member’s data**: title, name, address, email address, telephone number(s), morning or afternoon member, gift aided subscription, bank account payment details (partial record only).
2. **Visitor’s data**: STRADFAS collects information from visitors to our events (giving STRADFAS this information is voluntary) consisting of name, address, and email address.
3. **Interested parties data**: STRADFAS collects addresses and email addresses of interested parties who have expressed an interest in receiving information about STRADFAS. Typically these are individuals living around Stratford-upon-Avon who may be in charge of organisations that STRADFAS wish to communicate with.

**Collection of data methods**

1. **Member’s data**: A membership ‘renewal’ form is sent to each member (or couple) each year with the member’s data that STRADFAS retains upon it (including title, name, address, email address, telephone number(s), morning or afternoon member, gift aided subscription). The member returns this form to STRADFAS with any corrections and their renewal fee(s): return of the form to STRADFAS is an opt-in acknowledgement by the member that STRADFAS holds this data.
We state on our renewal forms the reasons for our data collection (**see Appendix A**).
Where applicable the member also supplies a ‘Gift-Aid’ paper form which is maintained by the Membership Secretary for the statutory periods.
2. **Visitor’s data** is collected at the ‘visitor’s table’ at a STRADFAS event, including name and address. The visitor may refuse to give this information.
3. **Interested parties** information is gathered from member’s contacts, including name and address. Visitors are sent invitations to become full members at the start of a new subscription year.
4. **Emails**: We gather anonymous information about the emails STRADFAS sends out, such as number of emails recorded as successfully received, number of ‘bounces’ (non-deliveries).
5. **Website**: We gather anonymous information using cookies on our website to assess usage and origin by country (Google analytics). No personal information is gathered using this system. We do not have any embedded data collection such as Facebook, Twitter links, etc.
6. **Sensitive personal data** is not collected (e.g. race, genetic etc.).

**Register of Systems and Data storage**

**Member’s data is stored in three databases:**

1. Data supplied on the opt-in membership ‘renewal’ forms is transferred by the Membership Secretary onto a database on a single secure computer held at home by the Membership Secretary. The Membership Secretary is aware of their responsibilities under the GDPR to keep information secure. The database is password protected. Updates to the database are made as members notify changes. The opt-in ‘renewal’ forms are retained for 24 months and then destroyed. Gift-aid forms are retained for statutory periods and then destroyed. The computer is protected with anti-virus and malware protection. Offline Backups are made periodically.
2. Data from new members, and changes about existing members, is recorded on the secure Arts Society central database, including Title, Name, Address, email address.
3. Emails are recorded on an email server (May, 2018 = Mailchimp). STRADFAS is in control of the data, names and emails only. This is hosted outside the UK, and the conditions for this under e.g. ‘Safe Harbour’ (or latest international agreement) are kept under review.
4. Visitor’s data is held by the Membership Secretary on the database above. Interested parties data is held by an appointed STRADFAS member on a secure home computer, notified to the Membership Secretary.

**Use of Data**

The data indicated in this policy is used to administer STRADFAS (e.g. renewal fees, enquiries, volunteer teams, inform members of events or changes to events). STRADFAS ensures that information is gathered and used in a lawful manner consistent with the GDPR. See also **Appendix A** for the explanatory text our members receive.

Data is never sold, nor passed to third parties - with the exception of 2 and 3 above.

**Review, Retention and Removal of data**

A member may request, at any time, a copy of the data that STRADFAS has about them, and this will normally be supplied within one month of the request, after ensuring the request is indeed from the member or their representative.

Members can contact the Membership Secretary if they wish specific items of their data to be corrected or removed, and this will be dealt with in a timely manner.

Irrespective of the above, **STRADFAS will retain member’s data under the ‘legitimate interest’ legal requirement** for:

1. Administration and functioning of the society (STRADFAS requires access to member’s names, addresses, subscription payment information, morning or afternoon membership, and phone numbers for emergency contacts);
2. Legal reasons, such as retention of subscription and agreements for Gift Aid, retention of Trustee records, etc.

Subject to 2 above, member’s data is removed from databases following the subscription renewal date if they do not renew their membership.

Each email that STRADFAS originate has an ‘opt-out’ link to automatically remove their details from the email database (3, above) should they wish to.

**Data breach**

In the event that a STRADFAS Committee member or Trustee is informed of a breach of data held by STRADFAS, an investigation will be commenced, led by an appropriate STRADFAS member, to determine the size of the data breach, the number of individuals affected, and determine what actions shall be taken. The results of the investigation and actions taken will be recorded at the following committee meeting. If appropriate, the Trustees and Committee may decide to inform the Information Commissioner’s Office.

**Appendix A –Renewal and New Member’s forms, or in the renewal/invitation to join letter will state that** Members’ details will be processed fairly and lawfully, will be passed to “The Arts Society” for mailing of the quarterly magazine and other communications and details may be passed to “The Arts Society Area”, or other affiliated societies. Details will be kept safely and securely with the ability to opt out of communications at any time. STRADFAS retain basic details under the ‘legitimate interest’ legal basis to record membership.