

The Arts Society – Stratford-upon-Avon - STRADFAS

Protocol C1: Data Protection, Rev 3

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 every three years at the Committee meeting preceding the AGM. The review shall be recorded in the minutes of the Committee meeting.

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

STRADFAS collects members' data for the purposes of running STRADFAS, including:

- Notifying members of membership renewal and programme of future STRADFAS events;
- Collecting membership fees;
- Sending emails of STRADFAS 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. **Members' data:** title, name, address, email address, telephone number(s), morning or afternoon member, gift aided subscription, bank account payment details (partial record only).
2. **Visitors' 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 wishes to communicate with.

Methods of data collection

1. **Members' data:** A membership 'renewal' form is sent to each member 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: return of the form to STRADFAS is an opt-in acknowledgement by the member that STRADFAS holds these data. STRADFAS states on renewal forms the reasons for 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. **Events:** Organisers of events collect any data they require for the running of the event. These may include, but are not limited to, members' and visitors' names, addresses, e-mail addresses, emergency contact details.
3. **Visitors' data:** are collected at the 'visitors' table' at a STRADFAS event, including name, address and e-mail address. The visitor may decline to give this information. Visitors who provide their addresses are sent invitations to become full members at the start of a new subscription year.
4. **Interested parties:** Information is gathered from members' contacts, including name and address.
5. **Emails:** STRADFAS gathers information about the emails STRADFAS sends out, such as number of emails recorded as successfully received, number of 'bounces' (non-deliveries).
6. **Website:** STRADFAS gathers anonymous information using cookies on the website to assess usage and origin by country (Google analytics). No personal information is gathered using this system. There is no embedded data collection such as Facebook, Twitter links, etc.
7. **Sensitive personal data** are not collected (e.g. race, gender etc.).

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Register of Systems and Data storage

Members' data are stored in three databases:

1. Data supplied on opt-in membership application or renewal forms are transferred by the Membership Secretary onto a database. The database is password protected. Updates to the database are made as members notify changes. The computer used is protected with anti-virus and malware protection. Offline Backups are made periodically. The Membership Secretary is aware of his or her responsibilities under GDPR to keep information secure.
2. Where other Committee members hold copies of the membership list for the purposes of the business of the Society, such copies shall be duly protected by a password and they shall be subject to the same GDPR responsibilities as the Membership Secretary.
3. Data from new members, and changes about existing members, are recorded on the secure Arts Society central database, including title, name, address, email address.
4. Emails are recorded on an email server (Currently Mailchimp). STRADFAS is in control of the data, names and emails only. This is currently hosted outside the UK, and the conditions for this under the latest international agreements are kept under review.
5. Visitors' data are held by the Membership Secretary on the database above. Interested parties' data are 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 are used to administer STRADFAS (e.g. membership applications and renewals, 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 are 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 may 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 members' data under the 'legitimate interest' legal requirement for:**

1. Administration and functioning of the society (STRADFAS requires access to members' 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, members' data are removed from databases after 24 months following the subscription renewal date if they do not renew their membership.

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

Opt-in application or renewal forms are retained for 24 months and then destroyed. Gift-aid forms are retained for statutory periods and then destroyed.

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 to determine what actions shall be taken. The results of the investigation and actions

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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 Members' forms, or in the renewal/invitation to join letter will state: "Note 1. Data Protection Act 1998: STRADFAS/The Arts Society use your details for Society purposes only, including the mailing of The Arts Society Review. We use the 'Mailchimp' system, and do not share your details with other third parties."

MODIFICATION HISTORY		
Revision level	Reason for change	Date
Rev 2	Published	April 2018
Rev 3	General updates; modification history added; procedure review period was one year; limit on data retention was on expiry of membership	April 2021