

# Ashtead and Leatherhead Probus

## Data Protection Policy - February 2023



Despite our tiny size and scope, data protection laws still apply to us. Your committee has reviewed those of its practices that might be impacted and have adopted the following policy, which is reviewed and amended as required:

1. The collection of certain personal information about members of any club is essential for the smooth running of the relationship between that club and its members. Thus, Ashtead and Leatherhead Probus ('the Club') needs members' names and addresses to record the fact of their membership. We need their names (and those of their guests) to compile the attendance register, their email addresses to distribute the monthly Newsletter and other communications, and their phone numbers for those times when personal contact is the most appropriate. Whilst the management of such information constitutes "processing", the formal consent of members to that necessary processing is not required under law. In this respect the law reflects basic common sense.
2. However, circulation of the Membership Directory, whilst legitimate and desirable, is not essential. Thus, compiling and circulating the Membership Directory is considered to fall outside the exemption from obtaining explicit consent. Accordingly, we seek members' written consent, for so long as they remain a member, to the inclusion of their details in future Directories.
3. Committee members are required to consent to being identified on the Club's website. Ordinary members are not identified, though their image may appear in photographs of Club events posted on the Club's website, its Facebook page or other promotional materials, as may images of their guests.
4. As has been the case for many years, the use, storage and destruction by the Club of members' information is strictly regulated, whether or not consent to processing is required. Accordingly, such information:
  - will be used only for the purposes of managing the Club's affairs and for no other purpose
  - will be kept confidential and processed only by those members who have a legitimate reason for doing so. The Secretary and Treasurer are obvious examples but there will be occasions when others, the Visits Secretary for example, have such a reason
  - will be appropriately secured, whether in hard copy or on computer, in ways designed to prevent access by third parties. Necessary exceptions to being always secure are the register taken at each meeting and any "sign up" registers used at meetings in regard to visits or events
  - will never be shared with or supplied to third parties without consent
  - will be destroyed within a reasonable time of a member ceasing to be a member or withdrawing their consent to being included in the Directory or in photographs published by the Club. Guests may also at any time withdraw their consent to the use of their photograph for promotional purposes. Given that we operate on the basis of annual membership, and publish the Directory only once a year, complete destruction of information from that particular document may take some months
  - if financial, will be kept for 6 years and if relating to any insurance claim, will be retained for such reasonable period as the Committee deems appropriate for the resolution of the claim.
5. Our current method of communication is email. Bearing in mind the structure and limited resources of the Club, members not on email should arrange with another member to receive Club communications via them.
6. For members bringing guests to Club meetings, going on visits or participating in other events, additional considerations may go beyond the use of photographs for promotional purposes and the requirements for consent to our holding records and processing information may be less clear. Clearly, we need to record the names of guests (for seating plans) and we need to have open lists of members and guests travelling on coaches or buying tickets. However, for reasons of health and safety, we may invite members and/or their guests to provide us with contact telephone numbers or to share details of any essential medication they may need to take if falling ill on a visit or other event. The principles set out in 4 above regarding the processing of information provided would, of course, apply.