

Data Protection Policy

1) Definitions

1. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.
2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

2) Responsibility

1. Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.
2. All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the association.

3) Overall policy statement

1. Art Friends Cambridgeshire (AFC) needs to keep personal data about its committee, members, volunteers and supporters in order to carry out group activities.
2. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
3. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
4. We will only collect, store and use data for:
 - a. purposes for which the individual has given explicit consent, or
 - b. purposes that are in our group's legitimate interests, or
 - c. contracts with the individual whose data it is, or
 - d. to comply with legal obligations, or
 - e. to protect someone's life, or
 - f. to perform public tasks.
5. We will provide individuals with details of the data we have about them when requested by the relevant individual.
6. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
7. We will endeavour to keep personal data up-to-date and accurate.
8. We will store personal data securely.
9. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
10. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
11. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
12. To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

4) Review

1. This policy will be reviewed annually.

Date: 7 October 2021

Signature (Chair): *Jennifer M Josselyn*

Signature (Secretary): *Frances A Hazlehurst*

Data protection procedures

1) Introduction

1. Art Friends Cambridgeshire (AFC) has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
2. These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

2) General procedures

1. Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with the GDPR. When it is stored on paper it will be filed carefully and securely.
2. When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.
3. We shall keep records of consent given for us to collect, use and store data. These records will be stored securely.
4. Round robin emails must always be sent so that the recipients cannot see anyone else's contact details, eg. by using BCC, unless a member of the recipient group has granted permission for their contact details to be shared.

3) Membership list

1. We shall maintain a membership list. This will include the names, contact details and administrative information to do with membership of people who are members of AFC.
2. Members will receive information about AFC's activities and events relating to AFC's aims that might be of interest to them unless they have notified us otherwise
3. We shall only keep data necessary to maintain membership and volunteer records
4. The Data Protection Statement on the Membership Application form explains how members' details will be used.
5. Members may ask to restrict the information they are sent as they wish and at any time and their record noted accordingly.
6. We shall not use the membership list in any way that the individuals on it have not explicitly consented to.

4) Mailing list (email only)

1. Anyone may request to be on the email only mailing list which will be used to keep them in touch only with AFC matters. They would be removed immediately on request.
2. Every communication to people on the mailing list must contain an invitation to unsubscribe.

5) Non-Members

1. We shall only keep details of non-members who for as long as they are needed; eg. during the processing of an event or an enquiry about membership. They may be invited to join the mailing list.

6) Contacting volunteers/committee supporters

1. Members may volunteer to help with the activities of AFC in a number of ways.
2. We shall maintain a record of those who have offered to help us and may put volunteers in touch with one another if the occasion calls for it.
3. Volunteers may be given access to the membership or mailing lists if they need it, eg. when dealing with tickets for an event.
4. Volunteers may not share the contact details of any members or non-members with anyone outside AFC or use them for anything other than AFC business without explicit consent.
5. Members may withdraw their offer to volunteer at any time.

7) Contacting committee members

1. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
2. Committee contact details will be shared among the committee.
3. Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than AFC business, without explicit consent.

8) Review

1. These procedures will be reviewed annually.

Date: 7 October 2021

Signature (Chair): *Jennifer M Josselyn*

Signature (Secretary): *Frances A Hazlehurst*