# Kingston Camera Club Data Protection Policy

# Introduction:

Kingston Camera Club (KCC) is accountable for the data provided to us by members and we have an obligation to demonstrate compliance with data protection principles.

The Data Protection Act 1998 and General Data Protection Regulation 2018, apply to the processing of personal data, and KCC is committed to complying with its legal obligations under these acts. KCC collects and processes personal data relating to its members in the course of running the club, administering membership, communicating with members, external competitions, and updates.

This policy covers any individual about whom KCC processes data. This may include current and former members, judges and lecturers. Processing of data includes: gaining consent, collecting, recording, presenting, storing, altering, and destroying.

1. **General Principles**

KCC complies with the principles of data protection (the principles) enumerated in the General Data Protection Regulations (GDPR). We will make every effort possible in everything we do to comply with these principles. The principles are:

**Lawful, fair and transparent**

Data collection must be fair, for a legal purpose and we must be open and transparent about how the data will be used.

**Limited for its purpose**

Data can only be collected for a specific purpose.

**Data minimisation**

Any data collected must be necessary and not excessive for its purpose.

**Accurate**

The data we hold must be accurate and kept up to date.

**Retention**

We will not store data longer than necessary.

**Integrity and confidentiality**

The data we hold must be kept safe and secure.

1. **What is the legal basis for collecting this data?**

KCC  collects personal data that is necessary for the purposes of its legitimate interests as a membership organisation and participant in locally and nationally recognised exhibitions/awards/competitions.  At least one of the following two conditions must apply whenever we process personal data:

**Consent**; we hold recent, clear, explicit, and defined consent for the individual’s data to be processed for a specific purpose. We must also ensure that individuals whose data is being processed by us are informed of the basis for processing their data, as well as the intended purpose. We do this by making this policy known when we seek consent.

**Legitimate Interest;** The processing is necessary for our legitimate interests.

# Key Points:

We will not share your data with anyone outside the Club, except when required by law, with our Insurance Company in the event of an insurance claim, or under specific circumstances outlined in section 8.

You give us permission as part of your annual membership renewal to attach your name to any images entered into internal or external competitions or exhibitions unless you specifically request otherwise.

Ask us if you want a summary of the information we hold about you. If you leave the Club your information will be deleted within one year, other than historical information attached to competition entries, unless you request otherwise.

KCC will take reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of both electronic and paper records.

Should there be a data breach, or your data is compromised, we will contact you and let you know what has happened.

**By joining the Club, you provide consent for us to use your details** so that we can contact you about your membership and Club activities.

# Membership data and how we manage it:

Appendix 1 lists what data the Club has, why we have it, where it came from, who looks after it, how we process it, how we keep it safe, and how long we keep it for.

# General security standards:

Data must not be copied outside the Club membership by any member.

Data must not be used for any non-­‐KCC related activities.

The Membership database and any other files containing personal data held by KCC will be held securely on a computer and in the cloud with all normal security features enabled.

Membership application and renewal forms will be kept securely by the Treasurer until superseded and will be destroyed when the member leaves.

Backup paper copies of some forms are kept to guard against data loss due to computer failure.

Only committee members have access to the membership list (which is the sole depository of members' data excluding images) which has restricted DropBox access

Emails to multiple members will always be addressed ‘BCC’ unless members explicitly agree to the sharing of details

# Data Controller and queries:

The Treasurer is the data controller for KCC. He/she bears overall responsibility for ensuring compliance with the Data Protection Act and regulations. He/she will answer members’ questions about their data and how it is protected.

Members are entitled to request data held about them on a computer or to request a photocopy of their original paper membership application or renewal. The Data Controller will provide this information within 1 month of asking. If there are inaccuracies in the data KCC holds about you, the Membership Secretary will make the necessary corrections on your request.

If you wish to complain about the way your data is being managed, then please contact the Chairman. If you are unhappy with the Chairman’s response, then you have a right to contact the Information Commissioners Office at [ico.org.uk](https://ico.org.uk/) (Tel 0303 123 1113)

1. **Who is your data shared with?**

Data on KCC committee members and Special Interest Group leaders is published on the website

Your personal data is not passed on by us to external organisations, with the following exceptions:

* Your name connected with your image for external competition submissions
* Surrey Photographic Association for committee members.

Data on judges and speakers is published on our website and our printed programme and in communications sent to other camera clubs in the Surrey Photographic Association.

1. **How can you ask for data to be removed, limited or corrected?**

Contact the Data Controller

1. **How long we keep your data for, and why?**

We normally delete data from the membership list within one year of members leaving the club. However, we will delete any details earlier on request.

Since underlying statistical data, such as information from competitions/exhibitions continues to be necessary in relation to the purpose for which it was originally collected and processed, results from these events are not deleted.   Historical lists and award lists are required for archiving purposes and names cannot be removed from them.

Other data, such as that relating to accounting or personnel matters, is kept for the legally required period.

1. **What about Social Media websites like Facebook?**

KCC has a presence on Facebook and WhatsApp, and all members are free to join these pages. If you join one of these Social Media sites, please note that providers of the social media platforms have their own privacy policies and that the club does not accept any responsibility or liability for these policies or the use of your personal data on them,.  Please check these policies before you join any social media platforms, which is required before you subscribe or follow the KCC presence on them.

1. **Zoom Meetings**

KCC has its own Zoom account that the Committee and other approved members use to host remote virtual meetings for presenters, speakers and judging sessions for the benefit of members. A small number of these meetings may be recorded if agreed by all present, and then subsequently shared with other members who wish to view the session, but were unable to attend when it took place. Such recordings will not be retained for longer than 30 days, and will be deleted by the KCC Zoom host within that period. Such recordings will contain not just the presenter’s video and speech, but also that of any members if they speak and/or have their webcams on during the session. To use Zoom, and join these sessions, KCC members must register for a Zoom account on their website. Zoom have signed up the US Privacy Shield which is an explicit commitment to align their security practices to those required by the EU, including GDPR, which is represented in the UK in the Data Protection Act of 2018.

# Review:

This policy will be reviewed from time to time to take into account changes in the law and the experience of the policy in practice.

Paul Waller

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**Appendix I**

Data register of all personal information held on members.

| **Ref.** | **Personal Data Held** | **Purpose** | **Source** | **Who keeps this** | **How Processed** | **How is it kept safe** | **Duration** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 01 | Full Name | To identify the member, communicate with member and make name tags | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 02 | Address |  | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 03 | Phone | To contact for exceptional club related purposes when email or post not timely. | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 04 | Email | The primary method to communicate for all club related activities | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 05 | Emergency contact | To contact in case of emergency situation with member | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 06 | Distinctions held | To know members skill level and photography knowledge | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 07 | Membership of Club Interest Groups | To manage Club Interest Groups | Member, Interest Group Coordinators | Committee members | Collected via email | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 08 | Other club memberships | To manage external competition entries | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 09 | Other skills and attributes | To know if there are other skills that can be shared with the club or its functioning | Member | Committee members | Collected via email or post on the initial membership and annual renewal forms | Secure Excel database on computer and in the cloud. Original forms kept in cloud and binder. | Deleted within 1 year of ceasing club membership |
| 10 | Bank details | To reimburse expenses when members purchase supplies for club or other payment requirements. | Member | Treasurer | Collected from member upon request for reimbursement via email | Kept in KCC records at Metro Bank internet banking platform | Deleted immediately upon leaving club membership or upon request by member. |