

Lostwithiel Museum Association

Data Protection Policy

SCOPE OF THE POLICY

This policy applies to the work of Lostwithiel Museum Association (hereafter 'LMA'). The policy sets out the requirements that LMA follow when collecting personal information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the LMA committee to ensure that LMA is compliant. This policy should be read in conjunction with LMA's Privacy Policy.

WHY THIS POLICY EXISTS

This data protection policy ensures that LMA:

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members' data
- Protects itself from the risks of a data breach

GENERAL GUIDELINES FOR COMMITTEE MEMBERS

- The only people able to access data covered by this policy should be those who need to communicate with, or provide a service to, the members of LMA.
- Data should not be shared informally or outside of the Museum Association.
- Induction training will be available to committee members to help them understand their responsibilities when handling personal data.
- Committee Members should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Personal data should not be shared outside of LMA unless with prior consent and/or for specific and agreed reasons.
- Member information should be reviewed and consent refreshed periodically via the membership renewal process or when policy is changed significantly.

DATA PROTECTION PRINCIPLES

Lostwithiel Museum Association will follow the 6 data protection principles identified by The General Data Protection Regulation.

1. Lawfulness, fairness and transparency

We will tell members what data processing will be done and all processing carried out will match this description. All activities carried out must be lawful.

2. Purpose limitations

Personal data will only be obtained for specified, explicit and legitimate purposes. Data will only be used for a specific processing purpose that the subject has been made aware of and no other without further consent.

3. Data minimisation

Data collected on a subject shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. In other words, no more than the minimum amount of data should be kept for specific processing.

4. Accuracy

Data must be accurate and where necessary kept up to date.

5. Storage limitations

Personal data shall be kept in a form which permits identification of data subjects for no longer than necessary. In summary, data no longer required should be removed.

6. Integrity and confidentiality

Data shall be kept in a manner ensuring appropriate security of the personal data including protection against unlawful processing or accidental loss, destruction or damage.

IMPLEMENTATION OF THESE PRINCIPLES

1. Lawful, fair and transparent data processing

Lostwithiel Museum requests personal information from potential members and members for the purpose of maintaining our membership records. The data we collect is:-

- ◆ Forename
- ◆ Surname
- ◆ Address and Postcode
- ◆ Number of People in member's household

In addition to the above data for those members who join on line we also collect your email address.

Lostwithiel Museum use our member's data in a way that can be reasonably expected for maintaining membership records. The collection of this data is covered under a section of the General Data Protection Regulations known as "Legitimate interests."

From time to time LMA may wish to contact members with news updates, details of special events, information about fundraising activities etc. When completing a membership application form, either on-line or a paper copy, prospective members will be asked to provide consent for LMA to contact them with such information in various ways, namely by email, landline telephone, mobile phone / text or by post.

A record of this consent, along with member information will be securely held on a password protected cloud based storage system hosted by Google.

LMA members will be informed that they can, at any time, remove their consent to receive promotional material and will be informed as to who to contact should they wish to do so. Once a LMA member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.

2. Processed for Specified, Explicit and Legitimate Purposes

Members will be informed as to how their information will be used and the Museum Committee will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about events and activities, including sending copies of our magazine Museum Matters
- Communicating with members about their membership and / or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership.

LMA will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.

3. Adequate, Relevant and Limited Data Processing

Members of LM A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name.
- Postal address.
- Email address.
- Telephone number(s)

Where additional information may be required, such as health-related information of volunteers, this will be obtained with the specific consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

There may be occasional instances where a members' data needs to be shared with a third party due to an accident or incident involving statutory authorities. When the committee consider this is in the best interests of the member then consent does not have to be sought from the member.

4. Accuracy of Data and Keeping Data up to Date

LMA has a responsibility to ensure members' information is kept up to date. Members will be asked to let the membership secretary know if any of their personal information changes. In addition, on an annual basis the membership renewal forms will provide an opportunity for members to resubmit their personal information and the opportunity to reconfirm their consent for the LMA to communicate with them.

5. Storage limitations

If a person ceases to be a member of Lostwithiel Museum Association then, in most instances, membership information will be deleted within 12 months of leaving. The exceptions to this are instances where there may be legal or insurance circumstances that require information to be held for longer whilst this is investigated or resolved. Where this is the case then the member/s will be informed as to how long the information will be held for and when it is deleted.

6. Secure Processing - Integrity and confidentiality

LMA committee members have a responsibility to ensure that data is both securely held and processed. This will include:

- Keeping the membership records on a secure, password protected, cloud based storage system
- Restricting access of the full membership list to committee members on a "need to know" basis. It is anticipated this will be limited to the Chairman, Membership Co-ordinator and Treasurer. In addition the administrator / webmaster who set up the system will also have access to these records.
- Committee members with access to the membership records shall use strong passwords which must not be shared.
- A subset of the full membership listing containing contact details of stewards, Town Guides and other volunteers shall be available to the Walks Co-Ordinator and the Stewards Co-Ordinator.

During the process of routine activities performed by Lostwithiel Museum Association services from the following 3rd party data processors may be used:

- Microsoft
- Google
- JotForm
- Zoho
- MailChimp

The committee has verified that these companies have a commitment to GDPR compliance.

7. Subject Access Request

LMA members are entitled to request access to the information that is held by the Museum Association. The request needs to be received in the form of a written request to the Membership Coordinator. On receipt the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. LMA will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

8. Accountability and Governance

The committee are responsible for ensuring that LMA remains compliant with data protection requirements and can provide evidence that it has. For this purpose, members will be asked to provide positive consent regarding the manner in which they are contacted. The evidence of this consent will then be securely held as evidence of compliance.

The Committee shall ensure that new members joining the Committee receive an induction into how data protection is managed and the reasons for this. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

9. Data Breach Notification

If a data breach occurs action shall be taken to minimise the harm by ensuring all committee members are aware that a breach has taken place and how the breach has occurred.

The committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The impact of the breach will be assessed and where necessary the Information Commissioner's Office would be notified. The committee shall also contact the relevant members to inform them of the data breach and actions taken to resolve the breach.