

AYRSHIRE ASTRONOMICAL SOCIETY

Data Protection Policy

1. Purpose

The purpose of this policy is to comply with the General Data Protection Regulations (GDPR) which come into force on 25 May 2018.

This policy shall be read in association with the Ayrshire Astronomical Society's (hereinafter referred to as "the Society") Privacy Policy.

2. Background

This policy has been developed with reference to national advice and that available from the Information Commissioner's Office together with examples of existing, or developing, practice.

3. Scope

This policy applies to all records where personal data is recorded. This includes records such as those held:

- On computer,
- On portable media such as pen drives,
- In paper filing systems
- Individual spreadsheets.

Personal data is any information that might allow an individual, or their characteristics to be identified. It includes qualitative information (e.g. names, addresses), numerical information (subscription category, age, date of birth) or photographic information.

All personal data is sensitive, but some information related to, for example, medical conditions, protected characteristics, looked after status (in the case of children and young people), or family circumstances are particularly sensitive. Any society member who knows such personal information by virtue of their role in the society should never disclose such information to a third party whether formally, or informally, unless it is to protect the safety of the individual concerned.

4. Statement of Principles

So far as reasonably possible, Ayrshire Astronomical Society will ensure that personal data is

- processed securely;
- updated regularly and accurately;
- limited to what the society needs;
- used only for the purpose for which it is collected and;
- used only for marketing purposes related to the activities of the Society.

5. Status

The Society is a data controller and a data processor within the meaning of GDPR because it collects and stores and processes personal data.

6. Communication

This policy will be available on the Society's website. Existing members will be made aware of its existence and how to access it by a bespoke email or other appropriate

method. New members will be made aware at the time of enrolment on their application form.

How the data is stored and used is contained within the Society's Privacy Policy that will be available on the Society's web-site.

Society officials will be reminded of their responsibilities through:

- An initial briefing.
- Regular review of this policy.
- Special to purpose briefings as required.
- An aide memoir (Appendix 3)

7. Events

When events are organised requiring the completion of a specific booking form, the following wording will be included:

" The Applicant agrees that the Society may publish such parts of the Applicants Personal Information as it considers necessary or appropriate as part of the event, and may pass such Personal Information to sponsors or any affiliated organisation for the purpose of insurance, permissions, or for publicity either for the event alone or combined with or compared to other events. This may include (but not be limited to) name, any other affiliation, and membership category. It will be limited to the minimum amount of Personal Information considered by the Society to be necessary or appropriate in the circumstances"

8. Why the Society Collects Data

The purposes for which the Society collects data are:

a. For Funding and reporting purposes:

anonymised data may be

- shared with a funding partner as part of a grant application or as condition of grant funding e.g. Local Authority; and
- analysed to monitor Society trends.

b. For Membership and Society management;

data will be used for:

- processing of membership forms and payments;
- sharing data with committee members to provide information about society activities, membership renewals or invitations to social events;
- Communicating with Members and;
- website management.

c. Marketing and communications;

for sending : (where separate consent has been given)

- information about promotions and offers from sponsors;
- information about selling society kit, merchandise or fundraising
- information to learned societies or professional bodies where it is relevant in relation to the activities of the Society.

9. Consent

Members must give consent for their data to be stored and it will be clearly stated on the website and membership application forms:

- That personal data will be stored on a lap-top computer which is password protected, and has appropriate security software installed, and which is backed up on a regular basis.
- Occasionally data will be stored on an encrypted pen-drive for purposes of transfer to another machine.
- Occasionally data will be e-mailed to office bearers, trustees or society officials for administrative or organisational purposes.

In addition, members will be asked to provide separate consents to be contacted by post, e-mail, SMS (text messaging), and telephone for Society related communications purposes.

10. **Data Capture**

Personal data must be as accurate as possible.

The membership application form will only contain questions or information fields that are simple, easy to understand and designed to capture the information for which they are intended.

The data requested will conform to, and be restricted by, the requirement to administer the Society in an adequate, efficient, effective and safe manner.

11. **Transfer of Data**

Data can only be processed for the purposes for which it is collected (Section 8).

Personal data, such as society members, names or their contact details will not be provided to any third party such as a society sponsor without the written (including electronic) consent of the member, or members concerned. It is permissible to allow members' details to be passed to a third party, if this has been made clear at the time of the enrolment, or renewal of the member or members concerned, or a specific consent has been obtained.

12. **Data retention**

It will also be stated on the website that personal data will be retained:

- while they are a Society member;
- for a period of not more than two years from the May following the period covering the last subscription. (For example, if their subscription expired in May 2017, their details will be removed on or before 30 May 2019.)

13. **Security**

Any office bearer or society member who is in possession of personal data will take all reasonable precautions to ensure data is stored and maintained securely, including, where appropriate:

- using password protection on documents;
- using password protection on lap-tops or equivalent;
- ensuring computer drives, including cloud technology is secure;
- ensuring that files and documents are backed up regularly;
- use of adequate security software to protect against hacking or other malware activity;
- use of encryption;
- ensuring computers, pen-drives or hard copy files are stored securely;
- ensuring that the risk of theft, for example from unattended vehicles is minimised;

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- ensuring that the risk of unintentional loss, for example, by being left on public transport is minimised; and
- ensuring that open computers or hard copies are not left where they can be read or easily accessed by third parties in the home, work, society or other setting such as public transport.

14. Breaches

Any potential breaches of the GDPR, for example if a file containing personal information is lost or stolen, shall be reported to the Information Commissioner's Office within 72 hours from on office bearer of the Society being made aware of the incident.

15. Data processors

If the Society commissions a third party organisation to process data, for example to host or maintain the website, then a written contract shall be in place. This contract shall ensure that the third party is aware of its obligations under GDPR.

Any such third party must provide reassurance that it has adequate security to protect personal data. It should be able to comply with the most up-to-date advice available.

16. Information Commissioner's Office notifications

The Society no longer has to notify the Information Commissioners Office (ICO) that it is a data controller and was in any case exempt under existing regulations as a not-for profit organisation.

Society members have the right to complain to the Information Commissioner's Office 0303 123 1113 or ico.org.uk

17. Responding to subject access requests

Subject access requests (requests for copies of any personal data, from individual society members) must receive a response within one calendar month. No charge will be made for dealing with the request. All such requests must be made in writing.

A log will be kept of all subject access requests detailing the date the request was received, who made the request, the substance of the request, the date a response was issued, and who responded on behalf of the Society.

18. Review

This policy should be reviewed in May 2019, and thereafter at three yearly intervals to ensure it includes best practice and the most current advice.

Appendices to this Document

Appendix 1: Text for inclusion on the Society website

Appendix 2: Text for inclusion on Membership Application Forms

Appendix 3: Data Protection Aid Memoir for Society Officials

Appendix 1 For Inclusion on the Society Website

The Society collects data for a number of different purposes. It will take all reasonable steps to keep personal information safe and secure. Sometimes it will provide data to a third party, usually in connection with the organisation of events or for sponsorship. The Society will only share your personal data if you have given permission. For the Society to store and use your data, you must first give your permission. You are entitled to change your permission at any time, and to see what information the Society holds about you. Personal data will be retained for the period that you are a Society member and for two years after you leave the Society.

A copy of the Society's Data Protection Policy and the associated Privacy Policy is available through this website. You should refer to this for full details on how the Society protects your data.

Appendix 2 For Inclusion on Society Membership Application Forms

Ayrshire Astronomical Society has a Data Protection Policy and a Privacy Policy that can be viewed at the Society website: www.ayrastrosociety.com.

Why we need this information

a. For Funding and reporting purposes:

anonymised data may be

- shared with a funding partner as part of a grant application or as condition of grant funding e.g. Local Authority; and
- analysed to monitor Society trends.

b. For Membership and Society management:

data will be used for:

- processing of membership forms and payments;
- sharing data with committee members to provide information about society activities, membership renewals or invitations to social events;
- Communicating with Members and;
- website management.
-

c. Marketing and communications:

for sending : (where separate consent has been given)

- information about promotions and offers from sponsors;
- information about selling society kit, merchandise or fundraising
- information to learned societies or professional bodies where it is relevant in relation to the activities of the Society.

How We Look After Your Data

Your information

- will be stored on a lap-top computer which is password protected, and has appropriate security software installed, and which is backed up on a regular basis.

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- Occasionally data will be stored on an encrypted pen-drive for purposes of transfer to another machine.
- Occasionally data will be e-mailed to office bearers, trustees or society officials for administrative or organisational purposes.

Personal data, such as society members, names or their contact details will not be provided to any third party without the written (including electronic) consent of the member,

By ticking the boxes below and signing the membership application form you are giving the Society permission to store and used your data in the ways described.

For marketing and communication purposes, I am happy to be contacted by (Please tick):

e-mail:

telephone:

SMS (text)

Signed (member): _____ Date: _____

Appendix 3

Data Protection Aide Memoir for Society Officials

1. Scope

This policy applies to all records where personal data is recorded. This includes records such as those held:

- On computer,
- On portable media such as pen drives,
- In paper filing systems
- Individual files such as coach's notes
- Individual.

2. Definition

Personal data is any information which might allow an individual, or their characteristics to be identified. It includes qualitative information (eg names, addresses), numerical information (subscription category, age, date of birth) or photographic information.

3. Sensitivity

All personal data is sensitive, but it is especially important to remember that some information are particularly sensitive, for example:

- medical conditions,
- protected characteristics,
- looked after status (in the case of children and young people), or
- family circumstances.

Any society member who knows such personal information by virtue of their role in the society should never disclose such information to a third party whether formally, or informally, unless it is to protect the safety of the individual concerned.

4. Right of Access

Members have a right to see anything that is held on record about them. Any comments or notes should be written on the assumption that the subject of the notes will be able to read what has been written without redaction.

If a member makes an access request, any information provided shall redact personal details of other individuals.

5. Security

Any office bearer of society member who is in possession of personal data must take all reasonable precautions to ensure data is stored and maintained securely, including:

- Using password protection on documents;
- Using password protection on lap-tops or equivalent;
- Ensuring computer drives, including cloud technology is secure;
- Files and documents are backed up regularly;
- Use of adequate security software to protect against hacking or other malware activity;
- Use of encryption;
- Ensuring computers, pen-drives or hard copy files are stored securely;
- The risk of theft, for example from unattended vehicles is minimised;
- The risk of unintentional loss, for example, by being left on public transport is minimised; and
- That open computers or hard copies are not left where they can be read or easily accessed by third parties in the home, work, society or other setting such as public transport.

6. Transfer of Data

Data can only be processed for the purposes for which it is collected (see section 6 of the Data protection Policy for detail).

Personal data, such as society members, names or their contact details cannot be provided to any third party such as a society sponsor without the written (including electronic) consent of the member, or members concerned.

It is permissible to allow members' details to a third party, if this has been made clear at the time of the enrolment of the member or members concerned.

7. Notification

If an officer bearer becomes aware of a possible data breach, for example through the loss or theft of records, you should report it to the Society President or Treasurer as soon as possible.