



General Data Protection Regulation Policy (GDPR)

This document describes how Killearn Community Futures Company (KCFC) will use personal data (information). It is designed to let members know what happens to any personal data that they give to KCFC, or that KCFC needs to collect about them in order to run the Company in a way compliant with the law and to protect their rights under data legislation.

In general, KCFC will only use the information members provide for Company purposes, retain it for the minimum period of time necessary, always allow members access to their own information, and keep it securely at all times.

A Member Director will take responsibility for data protection compliance.

What kinds of personal information does KCFC hold?

1. The Secretary hold the following information:
 - a. Contact details: title, full name, full address
 - b. Email
 - c. Membership type: adult
 - d. Membership Renewal: was membership renewed for the current year (yes/no)
 - e. Membership Payment type: Annual, Standing Order or Term with date of finish
 - f. Has an application form been returned for GDPR consent purposes: yes/no
 - g. Gift Aid Declaration signed on membership form: yes/no
 - h. Gift Aid Initials: initials of member if they have signed declaration
 - i. Membership Donation type: if a donation has been given, a tick box to show which working group fund it should be assigned
 - j. Comments: this is a personal *aide memoire* for the Secretary. It may include the year of first membership (eg 2015/16); may include amount of donation (if any).
2. The Treasurer holds the following information:
 - a. Gift Aid declarations and
 - b. records of membership payments for audit purposes
3. Working Group convenors hold the following information:
 - a. contact details: title, full name, full address
 - b. email
 - c. telephone number
 - d. Killearn Village Hall Operations Committee (KVHOC) also holds names and contact details of hirers of hall(s), wedding contacts and Three Sisters Bake (TSB) keyholders for day-to-day operations of the hall.

What is the source of the information?

1. KCFC and the Secretary or Treasurer
 - a. Personal information comes directly from the annual application form completed and signed by the member. KCFC only collects the information it needs, and keeps it only for the time it is needed.
2. Working Groups
 - a. Convenors source basic contact details from Group members to facilitate the management of each group.

What is the information used for?

The member's information is used to

- contact the member regarding annual renewal. This generally takes place in July/August and also includes information on the activities of the Company over the previous year.
- contact the member in September regarding the AGM which normally takes place in October.
- manage Company accounts.
- contact the member to pass on emergency information (eg severe weather).
- contact the member to pass on information from other local groups (eg Killearn Community Council).

What are the legal grounds for our processing your personal data?

KCFC relies on the following legal bases to use your personal information:

1. With your **consent**, where it is needed to provide you with information about Company activities, which include
 - a. Annual General Meeting;
 - b. Extraordinary General Meeting, if one were to be called;
 - c. Membership information and subscription form;
 - d. Managing and updating records, including those for Working Groups.
2. Information must also be kept in such a way as to comply with **legal obligations** regarding
 - a. declarations for Gift Aid and
 - b. auditing purposes.

Do we share your personal data with other organisations?

- In general, your information will never be shared, given or sold to any other organisation for any purpose.
- We will only share your data where we are required to do so by law (eg when claiming Gift Aid).
- We will not allow release of your information for profiling.

How and when can you withdraw your consent for KCFC to hold your information?

You can withdraw your consent at any time by

- not renewing an Annual membership when it becomes due;
- not renewing a Term membership when it becomes due; or
- stopping a Standing Order which pays for a membership renewal.

Is your personal information transferred outside the UK?

No. KCFC is based solely in the UK.

How long will KCFC hold your personal information?

1. The Secretary
 - a. will hold your membership information for as long as you remain a member.
 - b. will hold general membership information for two years (that is, the current year and the one previous). The oldest database holding information will be deleted after two years.
 - c. will occasionally need to access Working Group convenors' lists to ascertain that all volunteers are members of KCFC (as per Articles of Association).
 - d. In the case of a member moving out of the Operating Area and no longer wishing to remain a member, the Secretary will remove personal information as soon as notification has been received.
 - e. In the case of death, the deceased member's information will be deleted as soon as notification has been received.
2. The Treasurer
 - a. will hold personal information if Gift Aid relief has been claimed on your behalf. Personal information will be held on file for seven (7) years following the membership year in which membership ceased (eg membership ceased in 2000, information kept until 2008).
3. Working Group Convenors
 - a. In general, convenors
 - i. will hold personal information of KCFC members while they are members of the Group.
 - ii. will delete information of any Group member who does not consent to have their information held.
 - iii. will delete information of any KCFC member who hasn't been involved in the Group during the previous year.
 - b. In particular, KVHOC (Killearn Village Hall Operations Committee)
 - i. will retain information about weddings until the function is over and all payments made.
 - ii. will retain information on hirers until hire is completed.
 - iii. will retain information regarding Three Sisters Bake (TSB) as long as the café is leased to them.
 - iv. will retain such information as is necessary to comply with KCFC's finance and auditing regime.

How can I see the information held about me?

Members have the right to view their information at any time. A form of identification may be necessary (such as a driving licence).

1. KCFC membership
 - a. Contact the Secretary in the first instance. Access to personal information is free.

2. The member should normally be able to view their information as soon as is practicable, but certainly within a month.
3. Working Group membership
 - a. Contact the appropriate Working Group convenor. All contacts for convenors are available via the KCFC Secretary.
 - b. The member should normally be able to view their information as soon as is practicable, but certainly within a month.

How will KCFC monitor its own compliance with the GDPR?

The Company's policy will be reviewed by the Board annually to ensure the effectiveness of the way data information and security arrangements are handled.

A set of security policies and procedures will be put in place. These will include (but are not limited to):

1. Training for new Directors and members of Working Groups
 - a. will be available on or shortly after appointment and
 - b. will be reviewed to keep up to date with changes in the GDPR
2. Policies will be put in place
 - a. to develop a procedure to respond, record and process objections by members to processing their data; and
 - b. to allow the Company to effectively identify, report, manage and resolve any personal data breaches which might occur.

What are your basic rights under the GDPR legislation?

Here is a list of the rights that all individuals have under the new data protection laws. They don't all apply to membership of KCFC.

You have the right to

- **be informed;**
- to have your personal information **corrected if it is inaccurate;**
- to have your personal information **completed if it is incomplete;**
- to **object** to your information being processed;
- to **restrict processing** of your personal information;
- to **have your personal information erased** (the 'right to be forgotten');
- to have **request access** to your information and to obtain information about how KCFC processes it;
- to **move, copy or transfer your personal information** ('data portability').

KCFC does not use **automated decision making (decisions made using only technology) which has a legal effect or otherwise significantly affects you.**

You also have the **right to complain** to the Information Commissioner's Office (<https://ico.org.uk>).