

## North Norfolk Photographic Society (NNPS)

### Data Protection Policy

Compliant with General Data Protection Regulations (GDPR) 2018.

	HEADING	SECTION CONTENT
1.	Aims of this Policy	<p>This policy explains when and why NNPS collects personal information about its members, how it uses it and how it is kept secure and your rights in relation to it.</p> <p>NNPS is established with the objectives set out in its constitution and is a data controller within the UK who collects and uses personal data.</p>
2.	Principles	<p>GDPR Article 5(1) gives the principles in detail, but they can be summarised as:</p> <p>a) The controller may only collect personal data relevant for lawful purposes, and where the data is sufficient and adequate, is not excessive, and is kept accurate and up to date. Personal data must be destroyed when it is no longer relevant or required.</p> <p>b) The controller must keep personal data secure, but also available for the relevant purposes.</p> <p>c) The controller must respect the rights of data subjects, including the right of access.</p>
3.	Lawful Basis	<p>NNPS have a lawful basis for processing personal data, and that is to fulfil our contractual obligations to our members.</p> <p>NNPS needs to keep certain basic information regarding its members to carry out its day to day operations, to meet its objectives and to comply with legal obligations.</p> <p>NNPS does not require separate consent to process personal data in this way.</p>
4.	Individual Rights	<p>The GDPR provides the following relevant rights for individuals:</p>
4 a)	<p>The right to be informed:</p> <p>Personal Data collected, processed and stored</p>	<p>NNPS will collect, process and store the following personal data:</p> <p>i) Members name, address, telephone number, email address and information about images entered in club competitions or exhibitions where appropriate</p> <p>NNPS will use an individual's personal data to communicate with them regarding the day to day operations of the club's programme of events and activities. It will only be shared with current committee members.</p> <p>If a committee member circulates information to all members by email, the sender should place the circulation list in the 'Bcc@' section of the email header and not in the 'To' section.</p> <p>Committee members are responsible for ensuring that they maintain a separation between personal data from different data controllers (e.g. if they are a data controller for another club) and between controlled and domestic use of personal data.</p>

	<p>The Officers of NNPS will forward to members, communications regarding events, and information received, from the East Anglian Federation (EAF) and the Photographic Alliance of Great Britain (PAGB), and information regarding events being held at other clubs within the EAF.</p> <p>Information on other photographic related opportunities (direct marketing) will not be cascaded to members but when considered relevant, will instead be posted on the club's notice board in the meeting room.</p> <p>NNPS will retain your personal data on its systems for as long as you are a member of the club and for as long afterwards as is necessary to comply with our legal obligations (currently 3 years).</p> <p>Your data will be reviewed annually to establish whether NNPS is still entitled to process it. If it is established that such entitlement no longer exists, your data will no longer be processed except that your personal data will be retained in an archive form to enable NNPS to comply with any future legal obligations.</p> <p>NNPS will not hold any data termed as "Special Category Data" (previously known as "sensitive data") under the terms of the Regulations.</p> <p>In addition to personal data, NNPS will collect, process and store the following data relating to its members and club activities:</p> <ul style="list-style-type: none"> <li>ii) Class of membership, date joined, committee posts held, photographic distinctions obtained (if notified by member);</li> <li>iii) Annual subscription paid, method of payment;</li> <li>iv) Attendance records for meetings, events;</li> <li>v) Minutes of contributions at meetings e.g. AGM, committee meetings;</li> <li>vi) Images, author information and competition records for images submitted by members for use in internal competitions or exhibitions, or images chosen by NNPS to represent the club in external competitions;</li> <li>vii) Images and author information submitted by members for display on member's gallery on NNPS website;</li> <li>viii) Photos and videos of members engaged in NNPS activities;</li> <li>ix) Accident records, insurance claim records</li> <li>x) Details of members' expenses claims</li> </ul> <p>NNPS may use images and author information submitted to it to report on and promote club activities on the NNPS website and social media pages and in press releases. Such information may also be used on East Anglian Federation or Photographic Alliance of Great Britain website (or member club's websites in the case of inter-club competitions) and communications to report on club, inter-club or federation activities.</p> <p>NNPS will not transfer your personal data to any third party without your consent. NNPS will seek member's consent on their membership application form and on every subsequent membership renewal form.</p> <p>NNPS has implemented generally accepted standards of technology and operational security to protect your personal data from loss, misuse, or</p>
--	---

		unauthorised alteration or destruction. Members will be notified promptly in the event of any breach of your personal data which might expose you to serious risk.
4 b) & c)	The right of access to Personal Data and to Rectification	<p>Individuals may make a request in writing to the Secretary of the NNPS for a copy of their personal data held by the club, so that they are aware of and can verify the lawfulness of the processing. Such requests will be fulfilled within one month of receipt.</p> <p>An individual can make a request for rectification verbally or in writing. NNPS will respond to a request within one calendar month.</p> <p>If the request is manifestly unfounded or excessive NNPS is entitled to request a “reasonable fee” to deal with the request; or to refuse to deal with the request.</p>
4 d)	The Right to Erasure of Personal Information	<p>Individuals may make a request in writing to the Secretary of the NNPS for their personal data to be erased. NNPS will consider the request and respond within one calendar month.</p> <p>NNPS will action an individual’s request if:</p> <ul style="list-style-type: none"> <li>i) the personal data is no longer necessary for the purpose which NNPS originally collected or processed it for;</li> <li>ii) NNPS are processing the personal data for direct marketing purposes and the individual objects to that processing;</li> <li>iii) NNPS have processed the personal data unlawfully (i.e. in breach of the lawfulness requirement of the 1st principle);</li> </ul> <p>NNPS may refuse to action an individual’s request if the personal data needs to be retained to comply with legal obligations.</p>
4 e)	Restriction of processing	<p>Individuals have the right to request that NNPS restrict the processing of their personal data in the following circumstances:</p> <ul style="list-style-type: none"> <li>i) the individual contests the accuracy of their personal data and NNPS are verifying the accuracy of the data;</li> <li>ii) the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR) and the individual opposes erasure and requests restriction instead;</li> <li>iii) NNPS no longer need the personal data but the individual needs that NNPS keep it to establish, exercise or defend a legal claim; or</li> <li>iv) the individual has objected to NNPS processing their data, and NNPS are considering whether their legitimate grounds override those of the individual.</li> </ul> <p>NNPS will immediately restrict the processing of an individual’s personal data whilst considering its accuracy or the legitimate grounds for processing the personal data in question.</p> <p>This means that whilst the NNPS continues to hold personal data on the individual, the NNPS will not send any communications to that individual except in respect of their request.</p>
4 f)	The Right to Object	Individuals may make an objection in writing to the Secretary of the NNPS if they object to processing based on legitimate interests or direct marketing.

## NNPS Data Protection Policy

		<p>NNPS will stop processing the personal data unless:</p> <ul style="list-style-type: none"> <li>i) NNPS can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or</li> <li>ii) the processing is for the establishment, exercise or defence of legal claims.</li> </ul> <p>NNPS will inform individuals of their right to object on both the membership form and “at the point of first communication”: The New Members Newsletter.</p>
5)	Accountability and Governance	<p>GDPR Article 5(2) requires that the controller shall be responsible for, and be able to demonstrate, compliance with the principles.</p>
5 a)	Documentation	<p>This Data Protection Policy contains the information NNPS is required to document under Article 30 of the GDPR.</p> <p>In addition, NNPS will document the following:</p> <ul style="list-style-type: none"> <li>i) All Committee members and Officers of the club are required to confirm their acceptance and understanding of their responsibilities to act within the NNPS Data Protection Policy.</li> <li>ii) On resigning from Committee and/or leaving the club, committee members are required to confirm that they no longer retain any personal data relating to members on their home computer or in paper form.</li> </ul>
5 b)	Information Audits	<p>The NNPS will conduct an information audit annually which will:</p> <ul style="list-style-type: none"> <li>i) review the NNPS Data Protection Policy to ensure it remains GDPR compliant;</li> <li>ii) document what information is held and where it is stored;</li> <li>iii) document compliance with the Data Protection Policy;</li> <li>iv) review every individual’s data to establish whether NNPS is still entitled to process it</li> <li>v) ensure that any access/rectification/erasure or restriction requests have been documented, responded to and actioned appropriately;</li> <li>vi) ensure that only serving committee members have access to the information</li> </ul>
5 c)	Changes to Data Protection Policy	<p>NNPS reserves the right to amend this Data Protection Policy from time to time without prior notice in line with changes in legislation or NNPS activities.</p> <p>Members will be notified of any changes.</p>
6	Personal Data Breach	<p>NNPS will log and investigate any breach of personal data.</p> <p>If the breach is likely to result in a high risk of adversely affecting individuals’ rights and freedoms, NNPS will inform those individuals without undue delay and report the breach to the Information Commissioner’s Office (ICO).</p>

**Summary: Information held and why it is held.**

<b>Type of Information</b>	<b>Purposes</b>	<b>Legal basis for processing</b>
<p>Members name, address, telephone &amp; mobile number, email address</p>	<p>Managing the member's membership of the club.</p> <p>Complying with the club's legal obligations.</p>	<p>Lawful Basis:</p> <p>Performing the club's contract with the member for NNPS' legitimate interests in operating the club.</p>
<p>Images, author information, competition records:</p> <ul style="list-style-type: none"> <li>• submitted by members for use in internal competitions,</li> <li>• images chosen by NNPS to represent the club in external competitions</li> </ul> <p>Images and author information submitted by members for display on member's gallery on NNPS website</p> <p>Photos and videos of members engaged in NNPS activities.</p>	<p>Use on the NNPS website and social media pages and use in press releases.</p> <p>Use for selecting NNPS inter-club entries.</p> <p>Use on the website and in communications for other clubs, the East Anglian Federation or the Photographic Alliance of Great Britain</p>	<p>Consent:</p> <p>Members may withdraw their consent at any time by contacting the Secretary by email or letter.</p>