

APPENDIX 1 – DATA PROTECTION POLICY

A Camera Club will generally be a ‘not-for-profit’ organisation and so has an automatic exemption from the requirement to notify under the Data Protection Act 2018 (a not-for-profit organisation can make a profit for its own purposes, which are usually charitable or social, but the profit should not be used to enrich others. Any money that is raised should be used for the organisation’s own activities).

In order for the exemption from notification to apply, the processing of any data gathered must be for the purposes of:

- Establishing or maintaining membership
- Supporting the club
- Providing or administering activities for either the members or those who have regular (not necessarily frequent) contact with the club

The exemption also restricts:

- The type of personal information that can be held
- The people that it relates to
- The disclosures that an organisation can make

to only those necessary for the purposes described above unless the individual agrees their personal information can be released.

Information must not be kept after the relationship between the individual and the club ends, unless it is necessary for the purposes described above, and, even though Conwy Camera Club has an exemption from notification, the club is still obliged to respond within a month to a written request from an individual to provide a copy of the information that is held pertaining to that individual.

POLICY:

Conwy Camera Club will:

- Manage and process only personal data relating to membership of the club (or individuals who have regular contact with the club)
- Ensure that the data stored will be relevant to the relationship the individual has with the club. As a maximum information will be restricted to:
 - Name (including any photographic awards)
 - Address
 - Telephone Number/s
 - Email address
 - Date of Birth (only if age is under 18)
 - Relevant competition level, image titles and judge’s marks awarded
 - Subscription paid
 - Attendance at meetings (for the purposes of emergency evacuation, the weekly electronic raffle and analysis of the seasonal programme)
- Only pass on data to other organizations and third parties, such as the NWPA or the PAGB, with the consent of the individual
- Respond, free of charge, within a month to a written request from an individual to provide a copy of all data that is held pertaining to that individual
- Take reasonable measures to ensure the accuracy and safe keeping of the data they maintain and process
- Unless a specific request for immediate deletion is received from an individual, delete all information concerning that individual within 2 yrs. after the relationship to the club has ended. This provision is to allow for the possible reinstatement of returning members and to preserve their competition attainment record
- When a member fails to renew after several reminders, shred all paper documentation appertaining to that individual by November of that year
- Produce a supplementary document (maintained by the General Secretary) listing those appointed persons who use and have full or partial access to the Membership Database for the purpose of club administration; also any other personal data needed to administer the Club Website. This document will be displayed on the Members Pages of the Clubs Website
- Through the General Secretary, formally investigate all complaints of personal data breaches.