

FRIENDS OF ARGOS HILL WINDMILL

PRIVACY & DATA PROTECTION POLICY

1. Overview

- 1.1 Friends of Argos Hill Windmill Committee (the Friends Committee) keep certain information about its members, and financial supporters in order to run effectively and efficiently for the benefit of Argos Hill Windmill Trust Limited (the Trust) and the restoration, maintenance and repair of Argos Hill Windmill (the Mill).
- 1.2 To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The following policy sets out how this will be achieved.

2. Definitions

- 2.1 Personal data is information about identifiable, living individuals held on computer or in manual filing systems.
- 2.2 The Data Controller is the Friends Committee Secretary and the Friends Committee are ultimately responsible for the policy's implementation.
- 2.3 The Data Protection Officer is a nominated member of the Friends Committee responsible for reviewing and enforcing the Data Protection Policy.

3. The Policy

- 3.1 In keeping information about its members and financial supporters, the Friends Committee will follow the six Data Protection Principles set out in the General Data Protection Regulation (GDPR) effective from 25 May 2018, which are summarised below:
 - 3.1.2 Process data fairly and lawfully and transparently
 - 3.1.3 Purpose limitation: Collect data only for a specified, explicit and legitimate purpose
 - 3.1.4 Data minimisation: Collect and store data only to the extent which is adequate, relevant and not excessive.
 - 3.1.5 Accuracy: Ensure data is accurate and up to date
 - 3.1.6 Storage: Not keep the data for longer than is necessary.
 - 3.1.7 Integrity, confidentiality and security: Technical and organisational measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage
- 3.2 Any member of the Friends Committee, who processes or uses any personal information in the course of their duties, will ensure that these principles and the following procedures are followed at all times. Guidance notes to aid with adherence to the six principles above have been included in Appendix 1.
- 3.3 When the Friends Committee has cause to obtain personal data (such as names, addresses, phone numbers, email addresses) from members and financial supporters, this data will be obtained, stored and processed solely to assist the Friends Committee in the efficient running of the services supplied by them.
- 3.4 When personal data is requested from a new member or financial supporter, they will be given an explanation of how their personal data will be used. Written consent will be required to collect and store this data.
- 3.5 The Friends Committee members', the Friends and financial supporters' personal data will not be passed on to anyone outside the Friends Committee without explicit consent from them unless there is

a legal duty of disclosure under other legislation, in which case all the Friends Committee members will be consulted.

- 3.8 All Friends Committee members will have access to each other's personal data. Only the Secretary, Treasurer and Chairman will have access to the Friends' and financial supporters' personal data.
- 3.9 All the Friends Committee members will be made aware of the Friends Committee' Data Protection policy and their obligation not to disclose personal data to anyone who is not authorised to have it and will be asked to sign a declaration confirming their compliance to the policy.
- 3.10 All members and financial supporters of the Friends Committee will be supplied with a copy of any of their personal data held by the Friends Committee, within 30 days of the request, if a request is made.

4. Accuracy and Longevity

- 4.1 The Friends Committee will take reasonable steps to keep personal data up to date and accurate and make corrections in a timely fashion. Members' and financial supporters' personal and financial data may be kept for at least for 6 years after they cease to be a member or financial supporter of the Friends Committee.
- 4.2 If a request is received from an individual to destroy their records, the Friends Committee will remove their details from its database and request that all committee members holding paper or electronic details of that individual destroys them. This work will be carried out by the Data Protection Officer. It is the responsibility of the Friends Committee to inform the Data Protection Officer if such a request is received.

5. Storage

- 5.1 Personal data is kept in paper-based systems and on a password-protected computer system. Every effort will be made to ensure that paper-based data are stored in organised and secure systems.

6. Review of this policy

- 6.1 The Friends Committee Data Protection Policy will be reviewed every three years by the Data Protection Officer to ensure it remains progressive and reflective of the UK legislation.
- 6.2 Any recommended changes to the policy, appended policies, procedures and forms and will be submitted to the Friends Committee for approval.

Date policy adopted: 24 May 2018

Date for review:23 May 2021

APPENDIX 1

This outlines the practical ways we are adhering to the six principles of GDPR (effective from 25 May 2018).

1. Process data fairly and lawfully and transparently

- 1.1 We will let all new and existing Friends Committee members and financial supporters know what data we hold about them and why it is being held and collect their written permission to hold this data for the reasons outlined in the policy.
- 1.2 The privacy statement used for the above is in Appendix 2

2. Collect data only for a specified, explicit and legitimate purpose

The purposes for collecting personal data are:

- 2.1 to process the collection of membership fees and donations
- 2.2 to inform members and financial supporters of meetings and news items
- 2.3 to invite members and financial supporters to fund raising events and initiatives
- 2.4 to enable the processing of invoices and receipts
- 2.5 to inform and make donations to the Trust

3. Purpose limitation

We will only collect data for the reasons given above and will not use those details for activities that fall outside those of the restoration, maintenance and repair of the Mill.

4. Collect and store data only to the extent which is adequate, relevant and not excessive.

- 4.1 The information we collect are names, addresses, telephone numbers and email addresses.
- 4.2 The bank details of members of the members and financial supporters are kept securely by the [Secretary/Treasurer] of the Friends Committee.

5. Ensure data is accurate and up to date

- 5.1 We will review the data held annually.
- 5.2 We will delete data from our computer records or burn or shred any paper copies of data held on: anyone who, for whatever reason, informs us that they do not wish to be informed of, or take part in our activities or that we are informed has moved away or learned that they have died.

6. Not keep the data for longer than is necessary

We will adhere to number 5 above and in addition if the Friends Committee organises an event which is a "one off" event we will not keep the details of attendees unless they have given permission to do so. We will destroy the data according to 5.2

7. Technical and organisational measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage

- 7.1 We will keep paper records in a safe place.
- 7.2 Computer data records are held on password protected computers. The excel file that contains the contact details of all our members and financial supporters is also password protected and is only accessible by the Friends [Secretary and Treasurer].
- 7.3 If our computer systems are compromised in any way, the data protection officer will be informed and all the people whose data has been compromised will be informed.

APPENDIX 2 -PRIVACY STATEMENT WORDING

This statement will be given to existing Friends Committee members and financial supporters. All new members and financial supporters will be required to agree to their data being held on their application/donation form.

The Friends of Argos Hill Windmill (the Friends Committee) Privacy Statement

In accordance with the new General Data Protection Regulation (GDPR) which comes in to force on 25 May 2018, the Friends Committee is required to seek permission to store any personal data held about you and to allow us to contact you in the future.

What data we hold

Personal data that the Friends Committee holds are names, addresses, telephone numbers and email addresses. We hold bank details of members and financial supporters who pay by bank transfer, direct debit and standing order. These are stored securely on computer which is password protected.

Why we hold personal data

We hold this information in order for the Friends Committee to satisfy the expectations and requirements of our members and financial supporters to assist the Trust in the restoration, maintenance and repair of the Mill.

How it is stored

The data stored on paper is kept in a secure place.

Computer data records are held on password protected computers. The file that contains the contact details of all our clients and volunteers is also password protected and is only accessible by the Friends Committee Secretary and the Treasurer.

What we will NOT do with your data

Your data will not be passed onto to any third party without your permission.

Your data will not be used for any purpose other than for the effective restoration, maintenance and repair of the Mill.

Privacy Policy

The Friends Committee Privacy and Data Protection Policy can be accessed via our website or a hard copy can be obtained from the Friends Committee Secretary.

You can request to see the personal data we hold about you at any time.

We will regularly review the data we hold and update it accordingly and also remove your data from our records if requested.

If you grant us permission to store your personal data and use it to contact you about your membership, meetings and forthcoming events, please can you tick, sign, date and tear off the slip below and return to the Secretary Jenny Beaupain by one of these methods:

Scan this agreement and email to: [.....]
Post to Jenny Beaupains, Woodbine Cottage, Argos Hill, Mayfield, TN20 6

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I (name)..... give permission for the Friends of Argos Hill Windmill Committee to keep my name, address, telephone number, email address and financial information for six years

I have read the privacy statement above.

Signed:..... Print Name.....

Date.....

