

Valley Wheelers C.C

VWCC GDPR Policy

Version 1	Written: Hugh Brennan VWCC Chairperson	Approved: Steve Walker VWCC Secretary	Dec 2018
Version 2			
Version 3			
Version 4			

Latest Version	Dec 2018 – Version 1
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Definitions

Name	Valley Wheelers CC (VWCC)
GDPR	General Data Protection Regulation.
Responsible Persons	The VWCC Committee

1. Data protection principles

VWCC is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

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2. General provisions

- a. This policy applies to all personal data processed by VWCC
- b. The Responsible Persons shall take responsibility for VWCC ongoing compliance with this policy.

3. Lawful, fair and transparent processing

- a. Individuals have the right to access their personal data and any such requests made to the VWCC committee shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the VWCC committee must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be available.

5. Data minimisation

- a. The VWCC committee shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The VWCC committee shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the VWCC committee shall shred records (membership forms etc) annually.
- b. Phone records shall be updated on an annual basis.

8. Security

- a. The VWCC committee shall ensure that personal data is stored
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Mobile phone numbers will be used for club purposes only and not passed onto a 3rd party.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the VWCC committee shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the appropriate persons.

End of Policy