



over 100 years ...and still growing
Yma ers 100 mlynedd..... ac yn dal i dyfu

Data Protection Policy

Beaumaris Allotment Society ('the Society') is fully committed to compliance with the requirements of the General Data Protection Regulations (GDPR) set out in the Data Protection Act 2018 (the Act) which came into effect on 25 May 2018.

The Society will therefore follow procedures which aim to ensure that all employees and plot holders, and others who have access to any personal data held by or on behalf of the Society, are fully aware of and abide by their duties under the GDPR 2018.

The Society is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal data.

1. Statement of policy

In order to operate efficiently, the Society has to collect and use information about people with whom it operates. These may include current, past and prospective plot holders and supporters. In addition, it may be required by law to collect and use information in order to comply with the requirements of central government.

This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means, and there are safeguards within the GDPR to ensure this.

To this end, the Society fully endorses and adheres to the principles of data protection as set out in the GDPR 2018.

2. The principles of data protection

The GDPR stipulates that anyone processing personal data must comply with eight Principles of good practice. These Principles are legally enforceable.

The Principles are:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

- a. at least one of the conditions in Schedule 2 is met; and
- b. in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.

2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.

4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6. Personal data shall be processed in accordance with the rights of data subjects under this Act.

7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and “sensitive” personal data.

Personal data is defined as data relating to a living individual who can be identified from:

- that data
- that data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an expression of opinion about the individual and any indication of the intentions of the data controller, or any other person in respect of the individual.

Sensitive personal data is defined as personal data consisting of information as to:

- racial or ethnic origin
- political opinion
- religious or other beliefs
- trade union membership
- physical or mental health or condition

- sexual life
- criminal proceedings or convictions.

To comply with Schedule 2 and Schedule 3 of the Data Protection Act in practise, the Society must:

- a. have legitimate grounds for collecting and using the personal data;
- b. not use the data in ways that have unjustified adverse effects on the individuals concerned;
- c. be transparent about how the data will be used, and give individuals appropriate privacy notices when collecting their personal data;
- d. handle people's personal data only in ways they would reasonably expect; and
- e. make sure nothing unlawful is done with the data.

3. Handling of personal / sensitive information

The Society will, through appropriate management and the use of strict criteria and controls:

- observe fully conditions regarding the fair collection and use of personal information;
- meet its legal obligations to specify the purpose for which information is used;
- collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- ensure the quality of information used;
- apply checks to determine the length of time information is held;
- take appropriate technical and organisational security measures to safeguard personal information;
- ensure that personal information is not transferred abroad without suitable safeguards;
- ensure that the rights of people about whom the information is held can be fully exercised under the Act.

These include:

- the right to be informed that processing is being undertaken;
- the right of access to one's personal information within the statutory 40 day;
- the right to prevent processing in certain circumstances;

- the right to correct, rectify, block or erase information regarded as wrong information.

In addition, we will ensure that:

- there is someone with specific responsibility for data protection in the Society;
- everyone managing and handling personal information understands that they are responsible for following good data protection practice;
- everyone managing and handling personal information is appropriately trained to do so;
- anyone wanting to make enquiries about handling personal information, whether a committee member or plot holder or a member of the public, knows what to do;
- queries about handling personal information are promptly and courteously dealt with;
- methods of handling personal information are regularly assessed and evaluated;
- data will only be shared with Beaumaris Town Council as defined in the Data Protection procedures which sets out the scope and limits of the sharing. Any disclosure of personal data will be in compliance with approved procedures. Data may also be shared with other statutory bodies if the Society is obliged to do so at the request of the Police service or by the serving of a valid notice or order;

All employees and plot holders are to be made fully aware of this policy and of their duties and responsibilities, and will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. In particular they will ensure that:

- paper files and other records or documents containing personal / sensitive data are kept in a secure environment;
- personal data held on computers and computer systems is protected by the use of secure password;
- individual passwords are such that they are not easily compromised.

4. Implementation

The nominated Data Protection officer is responsible for leading and monitoring policy implementation. They will also have overall responsibility for:

- the provision of cascading data protection training for committee members and plot holders within the Society;
- carrying out compliance checks to ensure adherence, throughout the Society, with the Data Protection Act.

5. Notification to the Information Commissioner

The Information Commissioner maintains a public register of data controllers. The Society is not required to register with the Information Commissioner as it is classified as a small not-for-profit organisation. This exemption also limits the type and extent of personal information that may be stored.

Procedural Note 1

No member of the Society is empowered by the Committee to download any content from OneDrive except the Secretary. Any content downloaded must be deleted from the Secretary's own device when finished with.