



## **DATA PROTECTION POLICY**

### ***Purpose***

This policy details how the Gritstone Club handles the personal data that it collects from its members.

### ***Definitions***

BMC: British Mountaineering Council.

Club: The Gritstone Club.

Committee: The Committee tasked with managing the Club as defined by Club Rule 3.

GDPR: The General Data Protection Regulation

Member Data: Personal data, as defined by the GDPR, relating to current members of the club.

MSO: The Membership Services Online system, run by the BMC.

Processor: Officers or Committee members of the Club identified by this procedure as authorised to process member data.

### ***Background***

This policy is written to comply with the GDPR.

Alterations to this policy need to be authorised by the Committee.

The Club does not have a Data Protection Officer. The Committee takes on the responsibility for complying with the GDPR.

The Committee is the 'Controller' as defined in the GDPR.

The minimum age for a member of the Club is 18.

### ***Integrity and confidentiality:***

The personal information about Club members is securely stored in the MSO. The BMC are responsible for ensuring the safe storage of the data.

Name, address, e-mail and telephone number also appear in Handbook in the secure cloud based storage database available to be viewed by members only.

Any breach of data confidentiality shall be reported to the Information Commissioner's Office within 72 hours of discovery. All members affected by the data breach shall also be informed.

### ***Privacy Notice***

The Club has a Privacy Notice that explains the Club's use of Member Data. It also details the rights of members to access the data the club holds on them and to have any mistakes in the data corrected. The method for contacting the Club about Member Data is given in the Privacy Notice.

The Privacy Notice is sent to all candidates applying for membership of the Club. It is also available on the club website [www.gritstoneclub.org.uk](http://www.gritstoneclub.org.uk).

### ***Members' consent to the Club Data Policy***

Existing members have received communication detailing the method of viewing the club's Privacy Notice and the club's Data Protection Policy. Their rights with regard to their stored data are detailed within.

New members will complete the application process which will contain details of how they can view the club's Privacy Policy and Data Protection Policy.

Payment of the annual subscription implies continued consent for the members personal data to be used as described.

The club undertake to inform members of any substantial change in the method of storage or use of their personal data.

Members have the right to opt out of publication of their details in the Members Handbook however their name will still appear.

If a member wishes to opt out of their personal details being passed on to MSO/BMC they will forfeit their membership as this is fundamental to running of the club.

### Member Data

The Club holds the following Member Data for each of its members:

*Data supplied by the member on the application form:*

- Name.
- Date of birth.
- Address.
- Telephone number(s).
- Email address.
- Handbook. Name, address, e-mail and telephone numbers to be included in the Handbook on the cloud based storage database available to be viewed by any member of the club.

*Data added by the Club in the MSO database:*

- Membership type.
- Year that member joined club.
- Paper newsletter (if the member has requested to be sent a paper copy of the newsletters).
- Email groups.
- Notes.
- Date updated (last modification to a record).

### **Processing of Member Data**

The Club carries out the following processes using the Member Data:

Process	Processor
Enter, modify or delete Member Data in the MSO: <ul style="list-style-type: none"> <li>• To complete the membership application process</li> <li>• To correct any inaccuracies in Member Data.</li> <li>• To invite new members to join the cloud based data storage system.</li> <li>• To signify the status of the annual subscription for a member.</li> <li>• To delete Member Data from the MSO when a membership has lapsed.</li> </ul>	Membership secretary Membership secretary Webmaster Treasurer Membership secretary
Download Member Data from the MSO and carry out the activities associated with the normal running of the Club. These include but are not limited to: <ul style="list-style-type: none"> <li>• Collecting the annual subscription.</li> <li>• Sending out notice and minutes of the Club AGMs or other matters.</li> <li>• Publish an annual Gritstone Club handbook containing members' details on the secure cloud based system.</li> </ul>	Treasurer Secretary  Handbook editor

<ul style="list-style-type: none"> <li>• Update Handbook as requested by members to reflect changes in their data in accordance with the policy.</li> <li>• Circulate General Club communications such as <ul style="list-style-type: none"> <li>○ Newsletters to keep members informed of club matters.</li> <li>○ Notices of forthcoming club events.</li> </ul> </li> </ul>	Handbook editor  Newsletter editor Meets Coordinator
Member's names (but not contact details) may appear in articles produced by the Club that are available in the public domain e.g. on the Club website or in the Club Journal.	Webmaster, Journal editor and other publishers.
Some members volunteer to help with editing and adding to the website. Their emails will be held securely on the website, where permissions are applied to enable them to support the website development.	Webmaster

### ***What the Club does not do with member data***

The Club does not:

- Pass on member data to any third party organisation or individual (except to the BMC).
- Carry out any automated decision making or profiling based on members' data.
- Hold any 'sensitive personal data' on members as defined by the GDPR.

### ***Email communication to members***

All emails sent by the Club to its members should contain the following notice:

"This email has been sent by the Gritstone Club. If you do not wish to receive further emails from the club, please send an email to [secretary@gritstoneclub.org.uk](mailto:secretary@gritstoneclub.org.uk) stating that you wish to unsubscribe from future emails."

### ***Data retention period***

The club will retain Membership Data for the following periods:

<b>Type of Membership</b>	<b>Retention period</b>	<b>Notes</b>
Current member	Throughout the time the individual is a member of the club	Data should be up to date. Out of date or incorrect data (such as a previous email address) should be deleted from all records as soon as the club is notified of the update
Former member	1 year after the member has ceased to be a member of the club	This includes data on former Temporary members, i.e. those who did not become a full club member
Temporary member	Throughout the time the individual is a temporary member.	Temporary membership should last no longer than 1 year.
Prospective member	3 months after the last contact with the individual	This is for those individuals who register an interest in the club (maybe via the club website) but do not proceed to becoming a member

### ***Responding to member requests:***

Any reasonable request from a member to view their personal data will be responded to within one month of receipt of the request.

Any inaccurate or incomplete Member Data shall be rectified as soon as possible after the error is noticed and in any case will be dealt with within 30 days.

Any member requesting right to erasure shall have their Member Data deleted from the MSO and shall be deemed to have resigned from the Club.

A log shall be kept of all member requests for access, data correction or data deletion together with a record of the corresponding Club response. Entry into the MSO and subsequent changes to the handbook are considered sufficient for this purpose.

***Changes to this policy***

This policy was last updated in April 2019.