



## DATA PROTECTION POLICY

### **Purpose of this policy**

To ensure that Letchworth Arts and Leisure Group (LALG) complies with Data Protection Regulations and properly protects the data it holds.

### **Scope of policy**

This policy applies to all centrally organised functions of LALG and Group Contacts (GCs) and covers all personal data held manually and electronically by LALG, including photographs.

### **Statement of policy**

1. We comply with all national guidelines, rules and regulations regarding data protection. The UK General Data Protection Regulation (GDPR) sets out seven key principles<sup>1</sup> that we are committed to upholding:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

### **2. Lawfulness, fairness and transparency**

We process personal data lawfully, fairly and in a transparent manner. We collect it for a specific and legitimate purpose as set out in clause 3.

### **3. Purpose limitation**

We only collect personal data for the purposes of membership administration and to provide information to Members on LALG's group activities, events, discount suppliers, linked organisations and other third party activities that may be of interest.

We use anonymised data for statistical purposes, for example to track membership numbers and demographic information year on year, and survey responses.

Consent to the collection of specified personal data is a requirement of membership. Members have the option to opt out of electronic communications.

We do not pass personal data to any third party other than for the distribution of our newsletter, email communications, payment processing and event management. We ensure that the third parties we use are also GDPR compliant.

### **4. Data minimisation**

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<sup>1</sup> Source: ICO's Guide to Data Protection

We collect the minimum amount of personal data that is required for the purposes set out in clause 3.

Personal data held is as follows:

**Required**

Name

Address

**Optional**

Home and/or mobile telephone numbers

Email address

Year of birth

**If registered on our website (for which a user does not have to be a Member)**

Email address

User name

Encrypted password

Nickname (name a user is known by on the site)

Activity groups a user has subscribed to

Online events a user has registered for

We also record the date of joining/renewal date and whether the annual membership fee has been paid, but not any banking or payment card details.

**5. Accuracy**

We make every effort to ensure our data is accurate and up to date.

Members can access and update their own data by registering on our website.

**6. Storage limitation**

We only retain personal data for as long as it is necessary to meet its purposes. Data retention periods are set out in LALG's Records Management policy and associated documentation.

**7. Integrity and confidentiality (security)**

We ensure that all personal data is held securely and confidentially.

The bulk of personal data is held in our secure membership database, to which there is limited access. If any personal data is held elsewhere there is a requirement to ensure that it is also held securely and confidentially, and permanently deleted when it is no longer required.

**8. Accountability**

All LALG volunteers, both those involved in centrally organised functions and Group Contacts, who have access to personal data as part of fulfilling their roles are bound by this policy.

Our procedures comply with the requirements of this policy.

Our Group Contacts hold contact information on those who are members of, or interested in, their groups. We provide best practice written guidance to Group Contacts to help them comply with this policy.

We have appointed a Data Protection Officer (DPO) who has the specific responsibility of overseeing data protection and ensuring that we comply with data protection principles and relevant legislation.

The DPO deals with any questions on data protection matters and alerts the LALG Committee of any significant matters arising.

The DPO maintains a centrally accessible audit trail of actions taken to meet data protection requirements.

#### **9. Privacy Statement**

Our Privacy Statement is available on our website or in hard copy so our Members and others know why we collect personal data and what we do with it. It includes information on their data protection rights and how to complain if they have concerns about our use of their personal information.

#### **10. Policy review**

This policy will be reviewed on an annual basis by the Committee. It will also be reviewed in response to changes in relevant legislation or good practice.

Review date: July 2024

**This policy was reaffirmed by the Committee at its meeting on 24 July 2023**