

WPCC GDPR Procedures

These procedures are aimed at ensuring compliance with the General Data Protection Regulation which came into force on 25 May 2018 and the WPCC GDPR Policy.

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The Regulation sets out six key principles which we need to consider, where Data must be;

1. processed lawfully, fairly and in a transparent manner
2. collected for specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes
3. adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed
6. processed in a manner that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

We also need to understand a member / Contact's rights under GDPR which are

- The right to be informed
- The right of access
- The right to rectification
- The right to erase (to be forgotten)
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subject to automated decision making, including profiling.

Certain situations may arise as a result of these rights

If we receive a request to delete their data or to port to another provider etc.

- We need to understand what data we hold
- What needs to be retained for legal reasons

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- If a delete request is received, we need to ensure deleted also from backups or any other stored area.

The following actions are to assist in dealing with these situations

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

The actions addressed by us are

- **To contact all existing members by e-shot to seek permission to continue to hold personal data and will record their authority.**
- **To contact all existing members by e-shot to seek permission to continue to hold personal data in respect of marketing activities, and will record their authority**
- **We have adopted a new Data Protection Policy in compliance with GDPR.**
- **We have reviewed our existing membership application and renewals letters to ensure they cover the requirements of GDPR in respect of granting the right to process members' data and provide information to them**

Example of member e shot

With the new General Data Protection Regulation (GDPR) coming into force, we are contacting you to request your permission to continue to hold personal data for the purpose of contacting you in respect of the charities' activities

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In addition they will be used to send you periodic email marketing communications, booking forms, event information and other communications that continue to update you on the charity.

Please 'insert click here button' to email your confirmation that we are still able to contact you using the current information that we hold for you. If you would like to confirm your details please add these to your email. If we do not hear from you we will unfortunately have to remove your from our databases and you may have to complete new paperwork to attend future events.

WPCC hold a full Data Protection policy in line with the new GDPR guidelines. For further information on how we will use and protect your data please contact wpcsimon@gmail.com for policy information.

More information about GDPR can be found at: <http://www.eugdpr.org/>. If you have any questions, please don't hesitate to get in touch

Example of marketing e shot

We hope you enjoy the updates, events and alerts we send you on developments, topics and changes in legislation and around the Charity its events, fundraising and other activities.

We would like to continue to send you these relevant communications, however, due to changes resulting from the new in General Data Protection Regulation (GDPR) you will need to confirm that you would like to continue receiving these from us.

To give your consent is easy

Please click on the buttons below and confirm your details – it will only take a few moments.
(insert click here button)

Your personal data will be stored and used in accordance with our Privacy Policy and Data Protection Policy and you can also unsubscribe at any time by contacting us by email, telephone or in writing.

If you haven't confirmed your opt-in status by May 28th 2018, we will be taking your contact details off of our marketing mailer list and removing from our database.

Thank you in advance and if you have any questions please contact us

We may produce a composite client e shot incorporating marketing consents.

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The Regulation requires us to ensure that the data is processed in a manner that ensures appropriate security of the data, and in order **to achieve this**

- We will require that all data is held on the charity's laptop and Desktop computers .
- All personal data will be securely password protected and systems will be encrypted.
- Information created is held securely on charity laptop and desktop computers.
- We will consider file encryption for data, currently we use encryption only on devices.
- We will review our procedures in dealing with Data Breaches / data theft etc.
- We will ensure that any deleted data cannot be restored from any future backups
- We are content for data to be stored temporarily on other encrypted devices if this is a practical way of operating e.g. if working from home
- We have a 6 monthly cycle of clearing data from laptops etc. to ensure sufficient protection of client data is achieved
- We will also look to a procedure to delete emails over one year old from GMail and will begin a process of reducing mailbox sizes. We will also remove any communications that hold personal data.
- We will only send personal data via encrypted emails as this is the safest delivery method for the charity. Emails sent with personal data will be encrypted and cleared from the email systems.

The Regulation requires us to ensure that the Data is collected for specified, explicit and legitimate purposes, is adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed and accurate and, where necessary, kept up to date. **To achieve this we will**

- Determine what personal information we hold; classified as structured data; that held on application software, and unstructured; that held elsewhere on the system
- Review all member specific information and delete any information that does not meet the above standard i.e. data that is specific and limited to what is (currently) necessary etc.
- Consider retention periods for all personal data and in particular the relevance of retaining such data beyond six years
- Review all marketing and other data to ensure we only retain personal information that is currently required.
- Review data held for former members and delete unless there are strong grounds for retention.
- Consider the privacy risk of retention of that data; and what privacy solutions are in place or could be made (Risk reduced, eliminated or accepted)

These regulations also apply to physical data held by the charity and we need to ensure computer access is secure.

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As a result

- All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar and no personal data left on desks overnight
- No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Charity or not, without the authorisation of the Data Protection Officer;
- Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Firm where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to the Charity that all suitable technical and organisational measures have been taken);
- When leaving the main office (even momentarily) staff will lock computers using the 'windows' & 'L' keys
- All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols;

We will hold training sessions to inform all staff of the requirements of GDPR and our approach to compliance. We will also amend our induction procedures to cover GDPR and ensure new starter staff read and confirm this document and the WPCC Data protection policy. Signed confirmation of the training sessions will be kept and stored at the Charity address in a locked cupboard.

Reviewed January 2024