

Essex Rock and Mineral Society

Data Privacy Policy 2018

V1

24/02/18

Introduction

Within the UK, an individual's confidentiality is currently protected by the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2016 (PECR). However from 25th May 2018, this confidentiality will be significantly improved because the Data Protection Act will be superseded by the much stricter General Data Protection Regulation (GDPR - Regulation (EU) 2016/679).

Amongst other changes, GDPR requires ERMS to obtain explicit consent from each member to both store their personal data electronically, and to use it to communicate with them. Implied consent is no longer acceptable. As before, personal information supplied by members to ERMS will continue to be stored electronically and securely but this data will now be deleted once it is no longer relevant (see below – Data Retention Policy). Conversely, paper copies of membership application/renewal forms and paper copies of lists of members (which include addresses) will be retained, for historical purposes.

What personal information does ERMS hold about each member?

ERMS stores the following personal information about each member, in electronic format:

- Name
- Address
- Phone numbers (landline and mobile)
- Email address
- Whether or not the member is over 18.

This is the only information that ERMS holds on any member, and in those cases where a member has declined to provide some elements of this data (e.g. landline telephone number - possibly because they do not have one), ERMS will make no attempt to discover and record this information from other sources (e.g. ERMS will not consult the BT telephone directory in order to discover the member's landline telephone number).

How does ERMS collect its members' personal information?

ERMS collects personal information from each member once per year, on the membership/renewal form, which currently exists only in paper format. Apart from renewing a member's consent, this annual collection of data means that ERMS records can be regularly updated with changes to a member's postal address, email address etc.

What does ERMS use this personal information for?

ERMS uses its members' personal information solely for the purposes of engaging in the legitimate activities of the Society. Examples of such activities are:

- Emailing of the monthly newsletter (Email address required)
- Coordination of field visits etc. (mobile phone number required). Because of Health and Safety and also insurance requirements, it is essential that we can communicate with members by mobile phone. For example, if we organise a field trip to a quarry, we need to be certain that all members have left the quarry at the end of the visit.

Although ERMS does not intend to engage in any form of marketing activity, some of the articles included within the newsletter (and possibly other communications) might conceivably fall within the legal definition of 'marketing'. For this reason, the membership form requests a member's consent to be sent marketing information.

Member's consent to hold personal information

GDPR and PECR require that ERMS obtains each member's explicit consent to:

- a) Electronically hold all of the personal information that they give us on the paper membership/renewal form
- b) Use any of the following means to communicate with them:
 - email
 - landline telephone
 - mobile telephone
 - text message

ERMS obtains this explicit consent by requesting each member to fill in a tick box on the paper membership/renewal form to confirm consent. This consent must be renewed each year.

Who will ERMS share members' personal information with?

ERMS will not share members' personal data with ANY organisation or individual outside of ERMS. The only exceptions to this are if ERMS is required by law to divulge information e.g. by HMRC.

What format does ERMS hold a member's personal data is held in?

ERMS holds all members' personal data in a spreadsheet which is encrypted and password protected.

ERMS Data retention policy

When a member gives ERMS his/her personal information, ERMS will keep this information electronically for the remainder of the calendar year in which the member joined ERMS or renewed his/her subscription, plus an additional three (3) months (i.e. up to the end of March in the following year, so as to accommodate late renewals). After this time ERMS will delete all of that member's personal information from its electronic records.

Paper records (mainly application/renewal forms) may be retained for up to two (2) years after the end of the calendar year in which they were created.

Privacy notices

ERMS communicates its policies on member's data privacy in two ways:

- Limited explanation on the membership/renewal form.
- Complete description on the ERMS web site

The membership/renewal form recommends that members view the complete privacy policy on the ERMS website.

Member's rights to view all the personal information that ERMS holds about them

If a member wants to view all of the personal data that ERMS holds about them, they should write to the membership secretary, who will respond with this information within one (1) calendar month of receiving the request. ERMS reserves the right to request proof of identity of any person making such a request. For the avoidance of doubt, any request by an ERMS member to view the data relating to any other ERMS member will be rejected.

Withdrawal of Consent or modification/deletion of personal data

Any ERMS member who wishes to:

- withdraw or alter his/her consent to hold his/her personal information, or
- withdraw or alter their consent to be contacted by any of the electronic communication methods listed above

should write to the membership secretary, requesting this action. The membership secretary will change the ERMS records of the member's consent, including (where requested) modification or deletion of all of the member's personal information within one (1) calendar month of receiving the request.

A member has a right to object to the ICO (Information Commissioners Office) if they feel that the ERMS is not handling their data in a satisfactory manner.

ERMS reserves the right to request proof of identity of any person making such a request. For the avoidance of doubt, any request by an ERMS member to modify/delete the data relating to any other ERMS member will be rejected.

What is the Lawful Basis for holding and processing of a member's personal data?

GDPR requires that every organisation declares the Lawful Basis on which it stores and processes personal data. The Lawful Basis on which ERMS stores and processes a member's personal data is the Consent of that member to do so in order to take part in the activities of ERMS.

Data breaches

In the unlikely event that the personal information ERMS holds is compromised, in any way, ERMS will inform the relevant authorities (currently the Information Commissioners Office) with 72 hours of becoming aware of this breach.

Children

ERMS requires parental/guardian consent to hold the personal information about any member who is under the age of eighteen (18), as well as to send such a member any electronic communications. ERMS will require anyone who claims to be the relevant parent/guardian to present evidence that they are, indeed, the legal parent/guardian.