

## WHORLTON VILLAGE COMMUNITY ASSOCIATION

### DATA HANDLING POLICY

1. The Whorlton Village Community Association (WVCA), in pursuance of its charitable objects as listed in its Constitution dated 23 August 2021, needs to process personal data. WVCA accepts that it is a data controller for the purposes of the General Data Protection Regulation and that it must comply with the six principles for the handling of personal data. Personal data must be:

- fairly and lawfully processed
- processed for limited purposes
- adequate and relevant and limited to what is necessary
- accurate and where necessary up to date
- not kept in a way that people can be identified from it for longer than is necessary
- processed in a way that ensures appropriate security.

2. The WVCA officer responsible for compliance with GDPR is the Secretary, Mrs Mary Stastny. She will maintain the WVCA's databases in compliance with GDPR. WVCA will hold two separate, permanent databases, with one temporary database, as described below:

- A membership database with information required in fulfilment of membership contracts.
- A Legitimate Interests database held subject to satisfaction of a 'legitimate interests' assessment<sup>1</sup>. At the time of writing, this is limited to the mailing list for future events.
- At any one time, a single temporary database to record ticket requirements and payments.

The creation of additional databases will require the authorisation of the Chairman.

3. The WVCA Secretary will audit all information held annually to ensure that the WVCA databases are compliant with the six principles of GDPR. In particular, the audit will ensure:

- that data is held in compliance with the act
- that data held is accurate
- that no more data is held than is necessary
- that data will be held only for so long as it is needed.

After each annual audit the responsible officer will note that the audit has taken place and that she confirms to the Committee (at the Annual General Meeting) that the WVCA's databases are compliant with GDPR.

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<sup>1</sup> The LIA assessment requires that the information officer, before entering the data on the Legitimate Interests database, satisfies him/herself that WVCA is pursuing a legitimate interest in so doing, that processing the data is necessary for that purpose and that he/she has considered whether there are any balancing personal issues that override the right of WVCA to process that data (for example where that individual has particular vulnerabilities).

4. WVCA will ensure that all the data held is securely stored. This will apply to physical copies of data as well as computer-based data.
5. WVCA will respond within 28 days to any written request (including by e-mail) by a data subject for details of information held by WVCA on them.
6. This policy will be promulgated on the village website: [www.whorltonvillage.org](http://www.whorltonvillage.org)
7. The practical measures to be implemented in order to enact this policy are listed at the Annex.

*Signed on Original*

*Signed on Original*

**C J Connolly**  
**Chairman, WVCA**

**M Stastny**  
**Secretary**  
**GDPR Compliance Officer, WVCA**

**11 September 2011**

Annex:

- A. WVCA Data Handling Policy – Practical Measures.

## ANNEX A

### WVCA DATA HANDLING POLICY – PRACTICAL MEASURES.

1. Digital Data will be held on a password-protected computer. Apart from the exemption at para 6 below, the WVCA databases are not to be transmitted by email. Hard copy databases, if required, will be kept in a secure stowage such as a locked desk or filing cabinet.
2. Databases will only be maintained and updated by the Secretary/GDPR Compliance Officer. Only the Chairman and Treasurer, in pursuit of their duties, will have access to the data held by the Secretary.
3. With the exception of communications within the Committee and the volunteer cadre, all broad distribution emails from WVCA will be addressed through 'blind copies' (Bcc) so as to hide email addresses from other addressees.
4. **Membership Database.** The membership database will be limited to the following information:

First name/Surname/1<sup>st</sup> line of address/email/contact number
5. **Future Events (LI) Database.** The future event mailing list (LI) database will be limited to the following information:

First name/Surname/email/contact number

For ease of data handling, this database will be used as the basis for creating temporary (ticket sales) databases.

Every correspondence to addressees on the Mailing List is to include instructions on how to Unsubscribe and have details removed from the database.
6. **Temporary Databases.** Any temporary database (ticket sales) will be limited to the following information:

Initial/Surname/email/contact number/(un)paid/means of payment

This is the only database that may be shared via email (between Secretary and Treasurer)

As soon as an event is concluded and all payments received, the Secretary will email all database addressees to confirm (by response) if they wish their details to be removed from the LI database (Future Event Mailing List). On completion, the temporary database is to be deleted.