High Pavement Society GDPR Policy and Compliance Statement

This outlines GDPR responsibilities and how the HPS meets those requirements.

GDPR requires that:

*Article 5 – The controller shall be responsible for, and be able to demonstrate, compliance with the principles.*

*(a) processed lawfully, fairly and in a transparent manner in relation to individuals;*

*(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;*

*(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*

Information collected and the legal basis for it is identified in the High Pavement Society Privacy notice.

*(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*

Processes for individuals to view and correct their personal data held by HPS are outlined in the HPS Privacy Notice

*(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;*

The terms of data storage are for no longer than six years for information about contractors and members and data will be destroyed after this.

*(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures*

Personally identifiable data is expected to be handled with care and consideration in line with GDPR by all committee members, staff and third parties who come into contact with it. It should be secured and used only in line with its agreed purposes.

In the event of a data breach the HPS committee will investigate the causes, inform individuals affected and provide them with appropriate information and actively seek to prevent further occurrences in the future.

Training

Once per year a portion on of a committee meeting will be dedicated to:

* reviewing the principles of GDPR compliance
* reviewing changes to the organisation and its processes and whether this has an impact on data protection and GDPR
* assess and provide the necessary training needs associated with protecting and managing individuals’ data in line with GDPR requirements.

This will usually be the first committee meeting after the AGM to allow for any change in officers of the committee. Additional training will be provided on request for anybody who needs it. This will also be the opportunity to ensure all data is cleansed after 6 years.

Addressing Individuals’ Rights:

The right to be informed

When individuals become members or email subscribers with HPS they are advised that their information will be stored, provided with Privacy Information which includes a link to a more detailed Privacy Notice, that outlines their rights and how HPS addresses them under GDPR.

The right of access

On a Subject Access Request to the membership secretary, a copy of the membership records for the individual will be provided. Additionally, on request, a search of and list of emails that have been retained to or from the individual will be provided. Personal information from the accounts can also be provided on request. Copies of any retained non-public paper data relating to the individual will also be provided on request, if they exist. Providing this information will be free of charge and will be completed within one month.

The right to rectification

If information is incomplete or incorrect then it will be corrected by the membership secretary within two months.

The right to erasure

Information about individuals will be deleted as far as possible on request. Information for marketing purposes will be deleted two years after it was last used or upon request.

The right to restrict processing

(individuals can suppress processing of data-this is complicated and unlikely to impact on small organisations like the HPS and if an episode occurs then the regulations will be followed)

The right to data portability

Upon request, the membership secretary will provide a copy of the membership information. This will be completed within one month.

The right to object

Upon request from an individual, HPS will ensure that they do not receive direct marketing materials about the organisation.

This policy was agreed at an executive meeting on 15/11/2023

It will be reviewed no later than 1/12/2024