



HAYDAYS PRIVACY POLICY

This Privacy Policy has been prepared in accordance with the General Data Protection Regulation (GDPR) that came into effect on 25th May 2018. GDPR relates to the processing of personal data held by organisations. Haydays is committed to protecting the privacy of its members* and complying with the legal requirements of GDPR.

This Policy explains how Haydays collects, stores and handles the personal data of its members* and their rights regarding such information. To ensure it complies fully with the privacy and protection of its members* personal information Haydays has the following procedures in place:

AWARENESS

All committee members and those representing Haydays will be aware of the regulations and how it impacts on the sharing of personal data.

- A copy of Haydays Privacy Policy will be issued to committee members and any individual appointed to a specific role within the organisation.
- Haydays members will be advised of the Privacy Policy and how they can access it on the membership form. Hard copies will be available from the committee and electronically on the Haydays website.

INFORMATION HELD / COMMUNICATING PRIVACY INFORMATION

Haydays will only hold personal data that is required for the effective running of the organisation.

Haydays holds the following personal information about its members:

- Name, address & contact details
- Members who are 75 years and over for entitlement to free membership
- Whether a member has agreed to be contacted by email or chosen to opt out
- Whether a member has agreed to be photographed, or not, for use in Haydays promotional material

- Whether a member has a medical condition the organisation should be aware of in the event of an emergency
- Whether a member has a disability that may require additional assistance

This information will be obtained when members sign up for membership. It will only be shared by the committee and any individual appointed to a specific role within the organisation on a need to know basis.

Haydays holds the following information about its tutors:

- Name and contact details

This information will only be shared by the committee and any individual appointed to a specific role within the organisation on a need to know basis.

Additional Information:

- Haydays may hold some additional personal data information about its members if permission has been granted by the individual and it is directly relevant to the running of the organisation and/or their personal safety.
- Financial information on cheques and/or bank account details will only be used for the purposes of processing payment and will only be retained via the Bank of Scotland's internet banking system if required for regular payments to be made.

SHARING OF INFORMATION

- For health and safety reasons Haydays is required to advise St Andrews Town Hall Caretakers of any Haydays member that has a disability that requires additional assistance. This information will be protected under Fife Council's own Privacy Policy.

INDIVIDUAL RIGHTS

Haydays has the following procedures in place to ensure the rights of individuals are protected:

- Haydays will hold personal data of its members for the duration of the 'membership year' unless a member has requested that it should be erased from the organisation's personal files.
- Personal data of past members will be securely disposed of within a 12 month time frame from their membership lapsing. Any such information held as a hard copy will be shredded and any information held electronically will be deleted by the committee.
- Committee members that retire from the committee will be required to dispose of securely, or delete, any personal information they hold regarding Haydays members, or tutors, unless such information is still required for the effective running of the organisation in which case it will be passed on to a serving member of the committee
- Any Haydays member, or tutor, have the right to request a copy of any personal information held about themselves by the organisation at any time. This must be provided by the committee on a timely basis.

CONSENT

- Haydays members will be asked if they consent to have their photographs taken for use in promotional material. This will be a question on the Membership Form. Members will also be advised, in advance and given the option of opting out, before any photographs are taken.
- Members will be asked if they wish to receive information about classes or events by post and/or email.
- Members will also be consulted on whether they wish to receive information that may be considered of interest and relevant to Haydays members. These will be questions on the Membership Form.

MANAGEMENT AND SECURITY OF INFORMATION TECHNOLOGY

- Emails to Haydays members will only be sent to members who have agreed to receive them and will be sent out as 'blind' copies.
- No personal data information will be available on the Haydays website or social media
- Access to the Haydays email account will only be granted to serving committee members.

- Access will be protected by a password which will change after the AGM and/or when committee members step down
- Committee members will be vigilant to ensure any email attachments received by Haydays that look suspicious, or are sent by an unusual email address, will not be opened for security purposes.
- Committee members will only access the Haydays email account if they have up to date anti-virus/secure firewalls in place to protect the computers from infection/external attack
- Any personal data information that may have been received from a Haydays member, or tutor, electronically will be deleted within 30 days unless that information is required for the on-going running of the organisation.

DATA BREACHES

- Any complaint made regarding the processing of an individual's personal data by Haydays, or a breach of data protection, can be reported to any member of the committee. This will then be reported to the Data Protection Officer and investigated. Following investigation, the Data Protection Officer will report back to the committee and the individual who raised the matter. Should the complainant not be happy with the outcome of the investigation, and/or any action taken, they will be advised on how they can take the matter further. Further information/helpline can be found on the ICO (Information Commission Office) website or by phone 0303 123 1113

DATA PROTECTION OFFICER (DPO)

- A named member of the committee will be appointed as a Data Protection Officer
- The role of the DPO will be to ensure the organisation continues to comply with the requirements of GDPR and any relevant legislation. They will also be required to deal with and/or investigate any matters in relation to data protection.
- The name of the appointed DPO will be available on the list of committee members, and their roles, which will be available on the organisations notice board and website and/or on request.

ACCOUNTABILITY AND GOVERNANCE

- Haydays will review its policies and procedures on an annual basis to ensure it continues to comply with the requirements GDRP and any new legislation.
- The organisation will also review its effectiveness of data handling and security controls. Both the former will take place following the AGM and will be minuted.
- Haydays will appoint a Membership Secretary who will monitor and maintain the personal data information held by the organisation to ensure it remains accurate and up to date.

DATA PROTECTION REGISTRATION with ICO (Information Commission Office)

As a charitable 'non for profit' organisation Haydays is currently exempt from having to register with the ICO (Information Commission Office) and as such is not required to pay a fee

**Please Note: This policy will also apply to any personal information held about Haydays tutors*

This Privacy Policy has been reviewed and adopted by Haydays:

Signed:

Mark Dunkerley (*Chairperson*)

Date:

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