

Rotarian Action Group Against Slavery, General Data Protection Policy

Rotarian Action Group Against Slavery needs to keep and have access to certain information relating to its members and supporters to carry out its day to day operations and meet its objectives. It acknowledges the need to safeguard this Data. This information will be obtained fairly and lawfully, The reason we need this data is as follows

Communication is an operational requirement of RAGAS. Our preferred method of communication is by email. This enables transmission of information to all, through the pages of our regular Newsletter and/or by specific mailings. The Action Group operates within the Geographic Area of Rotary International. To enable us to complete this communication cycle within our administrative area we will need to store and have access to your following Personal Data. We will need Name, Email address, Club Name, the District Number of the Club, State/County, Country of Club location. It could be, that apart from your personal data, you may have expertise or information gained from your experiences. You are encouraged to share details with us, if you so wish. RAGAS would welcome your permission to receive, store, access, and on occasions, share this information. This would only be with your permission, and then only across our administrative group and coordinators. If the occasion should arise, this information, and your personal data would only be used, with your permission, then only through you.

The Action Group is committed to ensuring any personal data collected will be dealt with in line with GDPR (General Data Protection Regulation). To comply with the requirements, that personal information will be collected lawfully, used fairly, stored safely and not be disclosed to any other group unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the regulations and acts in accordance with our GDPR procedures. This document also highlights key GDPR within RAGAS policy.

This policy covers both members and supporters and will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant and not excessive
- Be accurate and kept up to date wherever possible
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures

The definition of 'Processing' is obtaining, using, holding, amending, destroying and deleting personal data. This may include paper based personal data as well as that kept on secure computer storage systems.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The Action Group will seek to abide by this code in relation to all the personal data it processes, i.e.

- 1 Accountability:** those handling personal data follow data handling principles to help gain trust and safeguard personal data.
- 2 Visibility:** Data subjects will have access to the information only about themselves that the Action Group holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- 3 Consent:** The collection and use of personal data must be fair and lawful and in accordance with the data protection principles. Personal data should only be used for the purposes agreed with the data subject. Personal data is not to be shared with a third party or used for another purpose.
- 4 Access:** Everyone will have the right to know the roles and groups of people within the Action Group who have access to their personal data and who has used this data.
- 5 Stewardship:** Those collecting and holding personal data have a duty of care to protect this data throughout the data life span, reckoned to be length of paid RAGAS membership. For supporters, until two bounced emails of monthly Newsletter or mailings.

Rotarian Action Group Against Slavery processes the following personal information: Name, Email Address, Rotary Club Name, Rotary District Number, State/County, Country of residence

Personal information is kept in the following forms: Secure Computer Data Files

People within the organisation who will have access to and process personal information are: Chairman, Vice Chairman, Secretary and Treasurer. The Independent Financial Adviser too inasmuch only as the data will be used to aid him/her in the verification of the accounts. On occasions email contact may be used by Coordinators with same constraints as Data Controllers with permission of Data Subject. Contact details may be used, but not held by coordinators.

Under the GDPR, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of Rotarian Action Group Against Slavery, this is the Board of Directors.

The governing body delegates GDPR tasks to the Data Controller(s). The Data Controller(s) is responsible for:

- understanding and communicating obligations under GDPR
- identifying potential problem areas or risks
- producing clear and effective procedures
- notifying of any relevant interim changes

All personnel who process personal information must ensure they not only understand but also act in line with this policy and the General Data Protection Regulation.

To meet our responsibilities Data Controllers will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed before collection or soon after;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate wherever possible;
- Review the length of time information is held, thought to be length of paid RAGAS membership;
- Supporters to be reviewed after five years. Data deleted after two bounced emails;
- Ensure Data is kept safely;
- Ensure the extended rights people have, in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is competent in the procedure.
- Anyone wanting to make enquiries about handling personal information follows a defined procedure

If there is a need, any disclosure of personal data will be in line with our GDPR procedures.

Queries about handling personal information will be dealt with swiftly and politely.

Training and awareness raising about Data Protection and how it is followed in this organisation will take the following forms:

- On induction: Into any position designated to be linked to Data handling

We will inform people whose information is gathered about the following: RAGAS General Data Protection Regulation policies.

Personal information will not be used apart from the exact purpose for which permission was given. Use of information or skill set other than personal data, **with permission** may be shared.

The names of the Data Controllers within this Rotarian Action Group, as specified, currently are Chairman Mark Little, Vice Chairman Dave McCleary, Secretary Harry Payne, Treasurer Stephen Sypula

Anyone whose personal information we process has the right to know, (**see last paragraph**) what information we hold:

How to gain access to this information

How to keep it up to date

How to it may be erased

How to object to data being held

They have the right to not be subject to automatic processing including profiling

Any deletion requests to be carried out as a joint operation by Data Controllers

Individuals have a right under our Privacy Procedure to know what personal data is being kept about **them alone** on our computer files. Any person wishing to access this data should apply, by email writing to Action Group Secretary: secretary@ragas.online

We can refuse or charge for requests that are considered manifestly unfounded or excessive.

If we refuse a request, we must tell the individual why, and that they have the right to complain to the supervisory authority ICO address below. This must be done without undue delay and at the latest, within one month.

The following information will be required before access to their own records is granted: Enquirers Name, email address, Rotary Club and District Number.

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within one month from receiving the written request.

This policy will be reviewed at intervals of 2 years to ensure it remains up to date and compliant.

If you have a problem with the way we hold and process your information let us know and we will endeavour to rectify the problem to your satisfaction.

Address your queries please tosecretary@ragas.online

GDPR Regulations require us to indicate where you can address your enquiries to if RAGAS cannot provide satisfactory answers to any question regarding how we care for your Data.

The governing authority regarding GDPR is....

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

RAGAS Secretary Harry Payne

4/4/18