

Unicorn Ceilidhs Information Management Policy & Process

BACKGROUND

The General Data Protection Regulation (GDPR) entered into British law on 25th May 2018. It impacts upon the control of data for all organisations. It applies to Unicorn Ceilidhs (UC). Full guidance on the GDPR is provided by the Information Commissioner's Office at this link <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>.

ACCOUNTABILITIES

The GDPR imposes specific accountabilities on the **Data Controller** (our Publicity person, Alan Creamer) for affected organisations. It also imposes accountabilities on any persons who may be data processors. Whilst it is possible that any UC Committee member may process data on our behalf of UC, normally these tasks will be restricted to just one or two committee members,

DATA SOURCES

Current Contacts Lists

We have two contacts lists – the customers and the possible interval entertainers. Both lists are stored as data on a personal computer.

Any member of either list may, at any time, request that their personal data not be included in or be removed from the list; this will be done as soon as reasonably practical.

Such requests may be addressed to UC by replying to the publicity emails, via our web site or by asking a committee member at an event.

Directory entries and any other personal data held by UC will be deleted as soon as practical after a request.

Our **Data Controller** will collect and retain details of those who ask to be added to the email list. UC does not use members' data for any purposes other than publicising our events or related social activities. UC does not share customers' data with any third parties whatsoever.

Any personal customers' data held or processed from time to time by UC, whether by the **Data Controller** or any other authorised person, must be subject to at least the following security:

- Electronic copy - on a local computer - as a minimum protected by a power-on password and suitable time-out locked screensaver
- Electronic copy - on remote or in cloud storage - any storage medium should be subject to individual password protected log-on for access

Data breach

In the event of any data breach affecting personal data relating to members, the UC Data Controller or a suitable designated deputy will inform the Information Commissioner's Office and any affected members within 72 hours of becoming aware of the breach. Suitable steps will be taken to identify the source and impact of the breach, to retrieve or delete affected information and to reinforce systems to avoid recurrence.

Historic data

As UC has been actively organising events since 2000, considerable historical personal membership data has been accrued. The data are all held in the two lists, and the Data Controller will occasionally take steps to delete from the list any names and email addresses which are known to be not current (eg by "post not delivered" warning messages for the email client software). There are no other copies of this information anywhere else.

Procedure for deleting people from the UC lists:

Anyone wishing to be removed from the database may:

- i) reply to the Data Controller by email after the mass email has been sent out to them, asking to be removed, or
- ii) contact UC via the website, in which case either the Data Controller receives a telephone call, or an email is sent directly to the Data Controller, or

iii) contact a member of the Committee, in which case the Committee member should immediately email or contact the Data Controller with the details.

The Data Controller will in all cases respond to the person wishing to be removed, confirming that this has been done, and within 28 days of receiving notification.

Alan Creamer
Data Controller

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