

## **SWSDTA DATA PROTECTION POLICY**

The SWSDTA fully endorses and is committed to compliance with the requirements of the General Data Protection Regulation (GDPR).

The Society needs to collect and use personal contact information about members (Individuals and Trials Societies) in order to operate and carry out its functions.

This personal information will be handled and dealt with properly and stored in computer records only.

### **Handling personal data:**

The Society will, through management and use of appropriate controls, monitoring and review:

- Use personal data in the most efficient and effective way.
- Will collect and process only the minimum data or information which is needed
- Use personal data only for such purposes as are described at the point of collection or for purposes which are legally permitted.
- Strive to ensure all information held is accurate.
- Not keep information for longer than is necessary.
- Securely destroy data which is no longer needed.
- Take appropriate technical and organisational security measures to safeguard information including unauthorised or unlawful processing and accidental loss or damage of data.
- Ensure that the personal contact information held is not shared with any other parties outside the Society.
- Ensure that there is general information made available to prospective and paid up members about their rights to access the information held.
- Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation

### **These rights include:**

- The right to be informed
- The right of access to personal information
- The right to request rectification
- The right to request erasure
- The right to restrict processing in certain circumstances
- The right to data portability
- The right to object to processing

## **The Principles of Data Protection**

The Society will comply with the 6 principles of good practice. These principles are legally enforceable.

Summarised, the principles require that personal data will be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals
2. 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;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;
5. 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;
6. 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.

## **Data Processing**

The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and 'special category' data.

Personal data is defined as any information relating to an identified or identifiable natural person e.g. members contact information.

Special category data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious/philosophical beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life or sexual orientation
- Biometric data

**No special category data is processed by the Society.**

## Privacy Notice

The Society will publish and keep up to date on its website a Privacy Notice detailing the following:

- What information is being collected?
- Who is collecting it?
- How is it collected?
- Why is it being collected?
- How will it be used?
- Who will it be shared with?
- What will be the effect of this on the individuals concerned?
- Is the intended use likely to cause individuals to object or complain?

## Amending and Destroying records

- When requested by a member all their personal information will be corrected / updated in all of the Society's records within 10 days of the instruction being received.
- When requested by a member all their personal information will be deleted from all of the Society's records within 10 days of the instruction being received.
- All paper copies of membership forms to be destroyed after 12 months.
- Archived former member's personal data on *Individual Members spreadsheet* to be deleted after 6 years.
- Archived former trial society's member's personal data on *Affiliated Trials Societies spreadsheet* to be deleted after 6 years.
- Financial information kept on Farmplan software.
- Society trials entry forms to be destroyed after 6 years.
- Emails and Facebook messages from members to be deleted after 3 years.
- Trial results removed from website after 6 years.

## Security Controls

1. All personal data held by the Society will be stored on a password protected and fully encrypted removable storage device (memory stick).
2. Access will be limited to the SWSDTA Secretary and Treasurer only.
3. Unused software and services will be removed from the device used for access to reduce potential vulnerabilities.
4. All default passwords used by software or hardware will be replaced by strong passwords.
5. The device used for access will have software installed to provide a firewall and anti-virus and anti-malware protection.
6. The software will be configured to automatically updated in response to the latest threats and vulnerabilities.
7. The software will be used to constantly scan the device to prevent or detect threats.

## **Data breaches**

The Society will, as required, report any personal data breach to the Information Commissioner's Office (ICO) where it is likely to result in a risk to the rights and freedoms of individual's e.g.

- if it could result in discrimination
- damage to reputation
- financial loss
- loss of confidentiality or
- any other significant economic or
- social disadvantage.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, the Society will also notify those concerned directly in most cases.

**The SWSDTA wish to acknowledge Martin Davidson from NWSDS for sharing the above information**