

1 General

1.1 Introduction

In order to operate, JMCO needs to gather, store and use certain forms of information about individuals.

These can include members, employees, contractors, suppliers, volunteers, audiences and potential audiences, business contacts and other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used, in order to meet JMCO data protection standards and comply with the General Data Protection Regulations (GDPR).

1.2 Why is this policy important?

This policy ensures that JMCO

- Protects the rights of our members, volunteers and supporters
- Complies with data protection law and follows good practice
- Protects the group from the risks of a data breach

1.3 Who and what does this policy apply to?

This applies to all those handling data on behalf of JMCO, for e.g.

- Committee members
- Employees and volunteers
- Members
- Contractors/3rd party suppliers

It applies to all data that JMCO holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers (including mobiles)
- Any other personal information held (e.g. financial)

1.4 Rules and responsibilities

JMCO is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for JMCO is Pauline Oultram. They, together with the committee, are responsible for the secure, fair and transparent collection and use of data by JMCO. Any questions relating to the collection or use of data should be directed to the Data Protection Officer.

Everyone who has access to data, as part of JMCO, has a responsibility to ensure that they adhere to this policy.

2 Data protection principles

a) We fairly and lawfully process personal data in a transparent way

JMCO will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name and contact details will be collected when they first join the group, and will be used to contact the member regarding group membership administration and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for 'subs'. Where possible JMCO will anonymise this data.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to JMCO completing tasks expected as part of the individual's membership)
- The name and contact details of volunteers, employees and contractors will be collected when they take up a position, and will be used to contact them regarding group administration related to their role.
- Further information, including personal financial information and criminal records information, may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to JMCO completing tasks expected as part of working with the individuals).
- An individual's name and contact details will be collected when they make a booking and to allow them entry to an event.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to JMCO completing tasks expected as part of their booking).
- An individual's name, contact details and other details may be collected at any time (including when booking tickets or at an event), with their consent, in order for JMCO to communicate with them about and promote group activities. See 'How we get consent' below.
 - Lawful basis for processing this data: Consent (see 'How we get consent')

b) We will only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

- When collecting data, JMCO will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

c) We ensure any data collected is relevant and not excessive

- JMCO will not collect or store more data than the minimum information required for its intended purpose. E.g. We need to collect telephone numbers from members in order to be able to contact them about group administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of group administration.

d) We ensure data is accurate and up-to-date

- JMCO will ask members and volunteers and staff to check and update their data on an annual basis. Any individual will be able to update at any point by contacting the Data Protection Officer.

e) We ensure data is not kept longer than necessary

- JMCO will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).
- The storage and intended use of data will be reviewed in line with JMCO's data retention policy. When the intended use is no longer applicable (e.g. contact details for a member who has left the group), the data will be deleted within a reasonable period.

f) We keep personal data secure

JMCO will ensure that data held by us is kept secure.

- Electronically-held data will be held under a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically held data (e.g. membership forms or email sign-up sheets) will be stored in a locked cupboard, filing cabinet or file box.
- Keys for locks securing physical data files should be collected by the Data Protection Officer, or Chairman of the committee, from any individual with access if they leave their role/position. The codes on combination locks should be changed each time an individual with data access leaves their role/position.
- Access to data will only be given to relevant committee members where it is necessary for the running of the group. The Data Protection Officer, or Chairman of the committee, will decide in what situations this is applicable and will keep a master list of who has access to data.

3 Individual Rights

When JMCO collects, holds and uses an individual's personal data, that individual has the following rights over that data. JMCO will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

3.1 Individual's Rights

- *Right to be informed:* Whenever JMCO collects data it will provide a clear and specific statement explaining why it is being collected and how it will be used. (For e.g. Via the membership form & Privacy Notice.)

- *Right of access:* Individuals can request to see the data JMCO holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
- *Right to rectification:* Individuals can request that their data be updated where it is inaccurate or incomplete. JMCO will request that members and staff check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- *Right to object:* Individuals can object to their data being used for a particular purpose. JMCO will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply, unless we have a lawful reason to use this data for legitimate interests or contractual obligation.
- *Right to erasure:* Individuals can request for all data held on them to be deleted. JMCO's data retention policy will ensure data is not held longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate or contractual obligation.
 - There is a legal requirement to keep the data.
- *Right to restrict processing:* Individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. If they have contested the accuracy of any of their data, JMCO will restrict the data while it is verified).

Though unlikely to apply to the data processed by JMCO, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

3.2 Member-to-member

We only share members' data with other members with the subject's prior consent.

To facilitate this:

- Members can request the personal contact data of other members in writing via the Data Protection Officer or Membership Secretary. These details will be given, as long as they are for the purposes of contacting the subject (e.g. email address, not financial or health data) and the subject has consented to their data being shared with other members in this way.

3.3 Use of Cookies

The JMCO website has been built using Weebly tools and all Weebly-based websites use cookies to collect **anonymised** data from website visitors. However, there will always be a standard warning banner (at the bottom of the screen) when someone first accesses the site,

which states: *This site uses cookies to personalise your experience, analyse usage and offer tailored promotions. To opt out click here: [Cookie Policy](#). If you click on this link, it automatically opts you out.*

Other than that, you may choose either the 'remind me later' or 'I agree' options.

4 Data Retention Policy

4.1 Introduction

This policy sets out how JMCO will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of JMCO Data Protection Policy.

4.2 Roles and responsibilities

JMCO is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for JMCO is Pauline Oultram. They, together with the committee, are responsible for the secure and fair retention and use of data by JMCO. Any questions relating to data retention should be directed to the Data Protection Officer.

5 Regular Data Review

A regular review of all data will take place to establish if JMCO still has good reason to keep and use the data held at the time of the review.

As a general rule, a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review will take place in October 2020.

5.1 Data to be reviewed

- JMCO stores data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members
- Physical data stored at the homes of committee members

5.2 Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other committee members, to be decided on at the time of the review.

5.3 How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
 - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
 - Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

5.4 Criteria

The following criteria will be used to make a decision about what data to keep and what data to delete.

Question	Action	
	Yes	No
Is the Data held securely?	No action necessary	Update storage protocol in line with Data Protection Policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for us and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data, unless we have reason to keep the data under other criteria
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate, do we have consent to use the data? This consent could be implied by previous use and engagement by the individual.	Continue to use	Get consent
Can the data be anonymised?	Anonymise data	Continue to use

5.5 Statutory Requirements

Data stored by JMCO may be retained, based on statutory requirements, for storing data other than data protection regulations. This might include, but is not limited to:

- Gift Aid declaration records
- Details of payments made and received (e.g. In bank statements and accounting records)
- Committee meeting minutes
- Insurance details
- Tax records

6 Other data retention procedures

6.1 Member data

- When a member leaves JMCO and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted- this might include bank details or medical data
- Unless consent has been given, data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

6.2 Mailing list data

- If an individual opts out of a mailing list, their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

6.3 Volunteer data

- When a volunteer stops working with JMCO and all administrative tasks relating to their work have been completed, any potentially sensitive data held on them will be deleted – this might include bank details or medical data
- Unless consent has been given, data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

6.4 Other data

- All other data will be included in a regular two year review.