



COMMUNITY MINIBUS ASSOCIATION (WEST SUSSEX) - DATA PROTECTION POLICY

The Community Minibus Association (West Sussex) is fully committed to the safe storage, processing and use of personal data relating to Members* and others. It will comply with both the spirit and the letter of all current and future regulatory requirements relating to this issue including the following:

- The Data Protection Act 1998
- The General Data Protection Regulations (GDPR) 2018
- The Data Protection Bill 2017 (when enacted)

The Association will only collect personal data which is necessary for the pursuance of its charitable objects and will process data in accordance with the following principles:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained for one or more specified and lawful purposes, and will not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data will be adequate, relevant and not excessive in relation to the purpose for which it is processed.
4. Personal data will be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose will not be kept for longer than is necessary for that purpose.
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and General Data Protection Regulations 2018
7. Appropriate technical and organisational measures will be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

The Community Minibus Association (West Sussex) is the “Data Controller” for the purpose of the legislation. The Association’s Secretary will be the point of contact for all data protection issues.

The Association will only collect personal data which is necessary for the performance of a contract or is provided with the explicit consent of the Data Subject.

Sensitive personal data (referred to as “special categories of data” in the GDPR) such as medical information will only be processed with the explicit consent of the Data Subject.

Information about individuals will not be disclosed to any third party without the permission of the individual, unless disclosure is required to comply with legal or statutory requirements.

The Association will provide written guidance for all volunteers who deal with personal data.

ACCESS REQUESTS

If requested to do so in writing the Secretary on behalf of the Association will:

- Confirm whether personal data relating to the subject of the access request is being processed;



- Provide a description of the personal data, the reasons for which it is being processed, and whether it will be given to any other organisations or people;
- Provide a copy of the information comprising the data; and give details of the source of the data (where this is available).

The Association will respond to access requests as soon as possible and within 30 days at the latest.

PRIVACY NOTICE

The Association will publish a privacy notice which will be made available to individuals when they provide personal data explaining the purpose of the processing and the right of the data subject to withdraw consent at any time.

RETENTION

Personal data will not be retained for longer than is necessary and will normally only be retained for 3 years after Membership has ceased. In special circumstances data may be retained for a longer period and for a specific purpose or purposes to be determined by the Trustee Board and in a format and location to be determined by the Board.

** In this policy the term Member includes Members and Associate Members as defined in the Charity's Constitution.*

Document Status	Date	Initials
First Draft	11 December 2017	AG
Second Draft	13 March 2018	AG
Third Draft	18 March 2018	AG
Final Draft	13 May 2018	AG
Approved	15 May 2018	Trustee Board