

# **Data Protection Policy & Privacy Statement**

# Banchory and District Men's Shed and BMS Web Site

Last updated - 20<sup>th</sup> July 2018 - Revision 0

# Why your data is collected

We maintain a database which contains necessary minimum personal data as collected during membership application and during the course of our activities including for HSE purposes. We will use all reasonable care to keep this data up to date and secure.

This Privacy Statement explains how we collect, store, manage and protect your data. It outlines the types of data that we hold and how we use this information to carry out the activities of the BMS. We aim to be clear when we collect your personal information, and not to do anything you wouldn't reasonably expect.

The legal basis for holding your data is your Consent for us to hold this data. We need this data to be able to fulfil our obligations under our Constitution, for OSCR requirements, and where applicable to ensure the Health and Safety of you and other members when engaged with activities or presence in the BMS Workshop. If you do not provide your consent for us to hold this minimum necessary data, we may need to restrict your access to Workshop activities (which can be hazardous) and may need to consider your status as a BMS Member.

This Policy/Privacy deals with the data obtained via BMS membership interaction. There is also a specific section below regarding your use of our web sites.

#### How your data is collected

Data is typically collected through the Banchory Men's Shed application forms. Further data may be collected as necessary for further activities for example for Health & Safety reasons when managing our Workshop and Premises.

## What information do we collect about you?

As part of management of the BMS, we store and process personal information relating to our members. We have reviewed our responsibilities under the GDPR and take our responsibilities under this regulation seriously; the personal information we obtain is held, used, transferred and processed in accordance with this regulation. The information we store may include:

- Name and title
- We may hold your date of birth but generally only if you have voluntarily provided that
- Postal address, email address, phone number(s)
- Necessary and relevant information (only) that may become necessary to meet Health and Safety requirements associated with operating our Premises including our Workshop, which includes hazardous machinery, tools and materials. No such information is currently held at the date of writing but is likely to become necessary as the workshop is built and this policy will be updated at the time.

We will minimise the data held and processed to that necessary only for management of the BMS.

We aim to keep your details up to date, and will occasionally conduct surveys to check the contact details we have for you are correct, updating them where appropriate.

## How we use your data

Upon receiving your consent to use your personal data, it will be used and processed by the BMS for a range of activities including (but not exclusively):

- Administrative requirements
- Notification of meetings
- Sharing information regarding our activities
- Retaining information related to HSE requirements in our workshop and premises. A copy of this information will be held in the workshop in paper form for use in an emergency such as injury; this will be kept locked with access only by the authorised key holder.

• Requests to complete surveys

In order to fulfil certain of these purposes, communications may be sent by post or email.

# **Retention of your Data**

In consenting to share your Data, you are giving permission for us to retain your Data for as long as is necessary for the purposes set out above, but certain Data may subsequently be retained for recording or auditing purposes or as required by law, our constitution or the OSCR. When any Data reaches the end of its retention period it is destroyed securely.

# Protecting your data

We are committed to holding your data securely and sensitively, in accordance with the GDPR. Your data are held on a secure computer or paper file within the Responsible Person's premises. Computer data is protected by appropriate authentication. Data may be held on paper where this data has been provided to us in paper form, such as physical membership application forms, or for HSE reasons as stated above. Access to all such data is restricted to the Responsible Person and any other individuals necessary but these will in any case be limited to BMS Board Members and Trustees authorised to see such data so as to carry out their duties with the BMS. This access is reviewed on a regular basis.

We will not disclose your data to individuals, organisations or other entities outside the BMS. We do not sell to or trade your data with any other organisations. Your Data will not be made available to any third party including with any commercial organisation for direct marketing purposes.

For bulk communications to many members by e-mail we will use the BCC function in our e-mailer to prevent your e-mail address being released to other individuals without your explicit consent. E-mails between BMS members, or Reply, Forwarded or follow-up e-mails from our members arising from one of our bulk e-mailings are excluded from this privacy policy as we have no control over the use of your e-mail by any member who may know or come to separately learn of your e-mail address.

If the security of the data we hold is breached, we will promptly assess the risk to you and if the breach is of a relevant nature also report this breach to the ICO.

## Your rights

You are obliged to share necessary minimum membership data with us in order to allow us to fulfil our responsibilities under our Constitution and OSCR requirements and for any HSE purposes as referred to above. If you wish to terminate our processing of data, we will observe this wish but it is possible this will mean we may need to suspend your access to the Workshop (for your own safety and that of others) and we may need to reconsider your BMS membership status. We undertake not to record or use your data in any way which will cause damage or distress. We will use your details until you tell us you resign as a member of the BMS. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive.

You have the right to:

- Request a copy of the information we hold about you, free of charge and for your own purposes, provided in a commonly used and readable form, within one month of submitting your request
- Request amendments to the information we hold about you
- Change your communication preferences at any time
- Withdraw consent, object to the processing of your information, request that we erase your personal information from our records or restrict the processing of your data at any time; if so, we may need to suspend your access to the Workshop for your own safety and that of others and we may need to reconsider your BMS membership status
- Lodge a complaint with the Responsible Person, escalated if required to the BMS Chairman, or the ICO

## Data accuracy

You are encouraged to make sure that your own data is accurate by communicating your updated details to us or by returning any update forms we may issue to you

# **Communication with Us / Access Requests**

This Policy is made available on the BMS web site at <u>http://www.banchorymensshed.org/documents</u>. If you are unable to access this and require a paper copy, please request it.

If you have any questions about this privacy statement, or would like to receive a copy of the information we hold about you, please contact us at: <a href="mailto:membership.bms@gmail.com">membership.bms@gmail.com</a>

#### **Responsible Person**

This GDPR / Privacy policy is operated by a "Responsible Person". As a small Charity organisation we do not have (and are not required to have) a dedicated person responsible for GDPR compliance. The role is likely to be shared by an individual who has other responsibilities. The current incumbent in the role is listed on the Contacts page of the BMS web site. The incumbent may be changed as required from one person to another or may come under the responsibility of the BMS Chairman or Secretary to either take up the role or nominate a new incumbent.

#### **ICO** Registration Exemption

As a not-for-profit organisation which only processes data for the purposes of managing membership information we are exempt from registration.

## Refer to https://ico.org.uk/for-organisations/register/self-assessment/y/N/Y/Yes/Yes/No/Yes

#### **Children and International requirements**

BMS do not hold data on Children nor do we have any International connections or business.

Our web site is viewable from abroad and we have no control over how information on the web site may be used, however, we do not post personal information (other than names of Trustees & Board members) or if necessary will only post any such information with your express consent.

#### Our Web sites / Cookies

We operate a web site at <u>http://banchorymensshed.org</u> and also have a Facebook page and Twitter page. The privacy policies for Facebook and Twitter are operated by Facebook and Twitter and for further information refer to their web sites. The information below refers only to our own web site.

Our website is built from a standard Wordpress "content management software" package. This uses cookies on our website. A cookie consists of selected information sent by a web server to your web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

These cookies are used by the internal workings of the Wordpress software only. We do not monitor or utilise these cookies. We do not sell or share your data with any third party.

Most browsers allow you to refuse or "block" cookies; search on-line for how to do this for your browser. If you block cookies this is likely to have a negative impact upon the usability of many websites, not just ours.

Internet hosting companies generally also log information about your browser and your visits to and use of this website, such as your IP address, browser type, referral source, length of visit and number of page views. They may also "look up" your geographical location but this is not always accurate. Our web site is hosted by TSOhost.

# Definitions

"Charity"	means Banchory and District Men's Shed, a registered charity, Scottish Charity Register,
	SCIO number SC045943.
"BMS"	Short form of the Banchory and District Men's Shed
"HSE"	Health, Safety and Environmental
"We" "Us" "Our"	Refers to The Charity, or BMS
"You" "Your"	Refers to any individual who may have their personal data processed by Us
"GDPR"	means the General Data Protection Regulation (Regulation (EU) 2016/679)
"OSCR"	Office of the Scottish Charity Regulator
"Responsible Person"	means the GDPR Data Controller for BMS. The current incumbent is given on the "Contacts" page of the BMS web site