



# Data Protection Policy

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## Berkshire Family History Society (and its subsidiary, Berkshire Family History Enterprises)

Last updated	12 Nov 2021
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## Definitions

<b>Charity</b>	means Berkshire Family History Society, a registered charity No 283010, The Centre for Heritage & Family History, Reading Central Library, Abbey Square, Reading, Berkshire, RG1 3BQ (and its subsidiary Berkshire Family History Enterprises).
<b>GDPR</b>	means the UK General Data Protection Regulation.
<b>Responsible Person</b>	means Bob Plumridge - Membership Secretary.
<b>Register of Systems</b>	means a <a href="#">register of all systems or contexts</a> in which personal data is processed by the Charity

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR which requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be

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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;

- e. 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; and
- f. 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.

## 2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity is registered with the Information Commissioner's Office as an organisation that processes personal data.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.
  - i. The online privacy policy contains links enabling people to request their personal data, request deletion and make a complaint

## 4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests

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[\(see ICO guidance for more information\)](#).

- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.
  - i. MailChimp provides an unsubscribe mechanism on every communication it sends
  - ii. All other communications are contract or legitimate interest

## 5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
  - i. Website forms that capture personal data, ask for only that information which is required to complete the task in hand, and ask for the user's consent to store that information for the purposes of completing the task and for legally-required record keeping/administration

## 6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
  - i. Registered users have direct access to and control of their user profile to make changes
  - ii. During the renewal process, they have the facility to change their personal details.
  - iii. At any time they may contact the Membership Secretary to request changes.
  - iv. There is a membership related contact form on the website
  - v. Volunteers who have access to member lists are prompted to delete downloaded files as soon as the intended purpose has been completed, to

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prevent retention out-of-date data

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place a data [archiving & retention policy](#) for each area in which personal data is processed and review this process annually.
- b. The data archiving & retention policy shall consider what data should/must be retained, for how long, and why.

## 8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date. This is achieved by using systems controlled by The Charity
  - i. Volunteers are required to use The Charity provided Google Workspace exclusively for any work related to the work of The Charity and are not allowed to use their personal computer to store said content or use any other application unless that application does not have a comparable counterpart in Google Workspace
  - ii. Exception is made for working groups where the data volume exceeds the Google Workspace allowance; and for long-term archival storage
    1. This data is stored on the Synology NAS drive and where users have a need for regular or high bandwidth access, by a synchronisation task to their personal computer. Access to Synology Drive is subject to strict rules about the user's personal computer's suitability (up-to-date OS, AV. Anti-malware, password protection)
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
  - i. We achieve this by using a "Need to know" security approach. Website content access is secured by rules linked to member/groups
  - ii. In Google Workspace, content is stored in shared drives to which access is strictly controlled
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.

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- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

Approved by Trustees 12 Nov 2021